

The company STRONGHOLD ITALY SRL, with registered office via ALBRICCI n ° 8, 20122 MILANO and operational headquarters via L. ABBIATI n ° 39, 25125 BRESCIA, VAT number 09049270961 (hereinafter, "Owner"), as owner of the treatment, informs you pursuant to art. 13 EU Regulation no. 2016/679 (hereinafter, "GDPR") that your data will be processed in the manner and for the following purposes:

1. Object of the treatment

The Data Controller processes the personal and identification data (specifically, name, surname, tax code, VAT number, email address, telephone number - hereinafter, "personal data" or even "data") communicated by you:

- when registering on the Controller's website for access to the reserved area and / or when completing the online form for requesting information.
- accounting activities (issuing of invoices, preparation of payments) and any data transfers abroad even in non-EU countries within the limits of the law and exclusively for tax reasons.
- possible sending of advertising and / or information material following your specific consent to subscribe to the newsletter.
- surveys, statistical and market research.

2. Purpose of the treatment

Your personal data will be processed:

A) pursuant to art. 6 lett. b, and of the GDPR for the following Service Purposes:

- allow you to register on the website and in the reserved area
- be able to ask for information and / or clarifications

B) Only with your specific and distinct consent (Article 7 of the GDPR), for the following Marketing Purposes:

- send you newsletters, commercial communications and / or promotional material on the goods / services offered by the Data Controller via e-mail and survey the degree of satisfaction with the quality of the goods / services.

3. Processing methods

The processing of your personal data is carried out by means of the operations indicated in art. 4 n. 2) GDPR and more precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your personal data are subjected to both paper and electronic and / or automated processing.

The Data Controller will process personal data for the time necessary to fulfill the aforementioned purposes and in any case for no more than 10 years from the termination of the relationship for the Service Purposes and for no more than 5 years from the collection of data for any Marketing Purposes.

4. Access to data

Your data may be made accessible for the purposes referred to in art. 2.A) and 2.B) of this information:

- to employees and collaborators of the Data Controller, in their capacity as persons in charge and / or internal managers of the processing and / or system administrators;
- to third-party companies or other subjects (for example, providers for the management and maintenance of the website, suppliers, credit institutions, professional firms, etc.) who carry out outsourced activities on behalf of the Data Controller, in their capacity as external data processors .

5. Communication of data

Your data for registration on the website will not be disclosed or disclosed to third parties.

6. Data transfer

The management and storage of personal data will take place on servers located within the European Union of the Data Controller and / or third-party companies appointed and duly appointed as Data Processors. The server is currently located in Italy, at the company's headquarters. The data will not be transferred outside the European Union except that it is functional to the services performed. In any case, it is understood that the Data Controller, if necessary, will have the right to move the location of the servers to Italy and / or the European Union and / or non-EU countries. In this case, the Data Controller ensures from now on that the transfer of non-EU data will take place in compliance with the applicable legal provisions by stipulating, if necessary, agreements that guarantee an adequate level of protection and / or adopting the standard contractual clauses provided for by European Commission.

7. Nature of the provision of data and consequences of refusing to respond

The provision of data for the purposes referred to in art. 2.A) is mandatory for the purpose of executing the request made by you. In their absence, we will not be able to guarantee neither the registration on the site nor the services of art 2.A).

The provision of data for the purposes referred to in art. 2.B) is optional. You can therefore decide not to provide any data or to subsequently deny the possibility of processing data already provided: in this case, you will not be able to receive newsletters, commercial communications and promotional material relating to the services offered by the Data Controller. In any case, you will continue to be entitled to the Services referred to in art. 2.A).

8. Rights of the interested party

In your capacity as an interested party, you have the rights referred to in art. 15 GDPR and precisely the rights of:

the. obtain confirmation of the existence or not of personal data concerning you, even if not yet registered and their communication in an intelligible form;

ii. obtain the indication: a) of the origin of the personal data; b) the purposes and methods of the processing; c) of the logic applied in case of treatment carried out with the aid of electronic instruments; d) the identity of the owner, manager and the representative appointed pursuant to art. 3, paragraph 1, GDPR; e) the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the State, managers or agents;

iii. obtain: a) updating, rectification or, when interested, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed; c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case where this fulfillment is proves impossible or involves the use of means that are manifestly disproportionate to the protected right;

iv. object, in whole or in part: a) for legitimate reasons to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by email and / or through traditional marketing methods by telephone and / or paper mail. It should be noted that the data subject's right to object, set out in point b) above, for direct marketing purposes using automated methods extends to the traditional ones and in any case the possibility remains for the interested party to exercise the right to object, even if only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or neither of the two types of communication.

Where applicable, it also has the rights referred to in Articles. 16-21 GDPR (Right of rectification, right to be forgotten, right to limitation of treatment, right to data portability, right of opposition), as well as the right of complaint to the Guarantor Authority.

9. How to exercise the rights

You can exercise your rights at any time by sending:

- a registered letter a.r. to STRONGHOLD ITALY S.R.L., with registered office via ALBRICCI n ° 8, 20122 MILANO and operational headquarters via L. ABBIATI n ° 39, 25125 BRESCIA
- an e-mail to the address: privacy@stronghold-group.eu

10. Owner, manager and appointees

The Data Controller is STRONGHOLD ITALY S.R.L., with registered office via ALBRICCI n ° 8, 20122 MILANO and operational headquarters via L. ABBIATI n ° 39, 25125 BRESCIA, CF and VAT number 09049270961

The updated list of data processors and persons in charge of processing is kept at the headquarters of the Data Controller.