

Rev. 02 of 01/10/2025

**Privacy Policy of the <https://delcambio.it> website
(hereinafter simply "Site")**

This information contains information on the protection of your personal data processed by us with reference to the registration, use and management of a profile on our e-commerce through the reserved area and the purchase of our products, pursuant to art. 13 of Regulation (EU) 2016/679 (hereinafter "R.E. 2016/679").

The following applies only to websites, social profiles and services, whose domains or properties are registered or attributable to the publisher RISORGIMENTO s.r.l., in particular to the delcambio.it domain and all third-level domains connected to it.

The processing of personal data will be based on the principles of correctness, lawfulness and transparency, protecting the confidentiality and rights of the data subject.

Data Controller

The data controller is:

RISORGIMENTO s.r.l.

Registered Office: Piazza Carignano n. 2 – 10123 Torino (TO)

VAT 10603300012

PEC: risorgimentosrl@legalmail.it

Telephone 011.546690

e-mail: privacy@delcambio.it

The Data Controller can be contacted at the following e-mail address: privacy@delcambio.it.

Personal data processed

We process your personal data to provide you with the best possible experience when you access our website, use our services and interact with us. This includes the following purposes:

1) To allow you to visit our website.

When you visit our website, we automatically collect certain information, including your IP address, login details, browser type and version, browser plug-ins, operating system, and platform.

During your navigation on our site, we may also collect other data such as the Clickstream URL, the articles viewed or searched for, any display and download errors, the time and duration of visits to certain pages and interaction with the page itself. To collect this data, we use various technologies, including cookies. More information on cookies is available in a specific information available in the footer of the website. If you require further information regarding the processing of your personal data, please contact us using the information we have previously provided to you.

Acquisition methods: The data are automatically provided by your browsing devices through the communication protocols of the Internet network (e.g. TCP/IP, UDP)

Basis of lawfulness: We process this data by virtue of our Legitimate Interest - art. 6.1 letter f) of the R.E. 2016/679 - to provide and improve navigation on our Site, offer efficient and secure web services trying to ensure the continuous improvement of your browsing experience over time.

How long we keep your data: We only keep your personal data for as long as necessary to enable you to browse the Site. In particular, some data is stored for the duration of your stay on the Site itself and others until you decide to delete them by deleting technical and functional cookies (e.g. language setting). For more information about managing Cookies, see our Cookie Policy in the Footer of the site.

2) Manage communications.

We collect your personal data when you communicate with us in person, through our website, email, by telephone or by any other means using the contact information we have provided to you through this Site. For example, we collect your contact details and details of our messages to and from you including data relating to when you sent them, when we received them and in some cases also where you sent them from.

Method of acquisition: The data are partly automatically provided in the communication protocol used by the tool you have chosen and partly are provided by you in the content of the communication.

Basis of lawfulness: We mainly process this data by virtue of our Legitimate Interest - art. 6.1 letter f) of the R.E. 2016/679 - to respond to your requests and manage the necessary communications. However, in some cases we may be held liable by virtue of specific contractual or legal obligations - art. 6.1 letters b) and c) of R.E. 2016/679.

How long we keep your data: Following up on contact or support requests you choose to send us, your personal data is only processed for as long as necessary to provide you with the information and/or assistance you need.

3) Manage data collection forms.

Description of processing: As a user, you can provide us with your personal data, including those that allow your identification when you fill in specific forms (so-called "Cookie Details"). Form"). These forms are designed to facilitate your requests and guarantee you quick and accurate answers and, if necessary, are supplemented by a specific privacy policy.

Method of acquisition: the data are voluntarily provided by you when filling out our request or registration forms. Failure to provide them will make it impossible for us to provide you with the requested service.

Basis of lawfulness: The processing is necessary for the execution of pre-contractual measures adopted at your request - art. - 6.1 letter b) of the R.E. 2016/679 .

How long we keep your data: We only keep your personal data on the site for as long as necessary to deal with your request.

4) E-commerce registration.

Description of processing: the personal data you provide when registering on our e-commerce as well as data regarding the purchase of our products through it.

a) Registration data

When you register on our e-commerce, we will collect your personal and contact data, such as name, surname, e-mail address.

b) Data required for registration and e-commerce purchases

When purchasing on the e-Commerce, you will be asked for additional information, such as the address for shipping the products and for invoicing, tax code, VAT number, as well as data relating to the means of payment used. We may also collect additional personal data when you need to contact us and send us requests in relation to the purchase of our products or the use of e-Commerce, through the appropriate contact form or the addresses on the site.

Your data will be collected for the processing of purchase orders and related activities (shipping and delivery of products, invoicing, payment management, etc.), as well as to allow your access and navigation within the reserved area where you can access exclusive features and services.

Personal data may be processed by the Data Controller for the processing of your requests, opening tickets for assistance, anti-fraud checks and to defend our rights in and out of court.

Method of acquisition: the data are voluntarily provided by you when filling out our registration and purchase forms. Failure to provide them will make it impossible for us to provide you with the requested service.

Basis of lawfulness: The processing is necessary for the execution of a contract or pre-contractual measures adopted at your request pursuant to art. 6.1 lett. b) of R.E. 2016/679 and our legitimate interest pursuant to art. 6.1 letter f) of R.E. 2016/679.

How long we keep your data: We keep your personal data on the site only for as long as necessary to comply with your request, for legal obligations relating to tax obligations (ten years) and beyond in the event of a defence in court.

5) **Direct marketing activities.** Your data may be used for direct marketing purposes, sending you promotional and commercial communications - with automated contact methods (such as text messages, e-mails, social networks, instant messaging apps) relating to services/products offered by the Data Controller.

The condition of lawfulness of the processing is your specific consent pursuant to art. 6.1 letter a) of R.E. 2016/679. You are free not to provide such consent, and you may withdraw it at any time.

6) **Sending communications (Soft Spam).** If you are already our customer, send you to the e-mail address you provided us at the time of sale of one of our products, communications for the promotion of products similar and/or similar to those you have already purchased ("soft spam"), unless you object to receiving such communications at the time of purchase or, subsequently, at any time, by using the appropriate link that you will find at the bottom of each e-mail or by writing to: privacy@delcambio.it

The legal basis is the legitimate interest of the Data Controller to promote products and services similar to those that are the subject of your purchase. You can object to such processing at any time by sending an email to privacy@delcambio.it or by clicking on the appropriate link to object to the receipt of such communications contained within each promotional email, and you will no longer receive such communications.

Processing of personal data collected through our social media profiles

When you follow our social channels (e.g. Facebook, Instagram, YouTube, etc.) or interact in any way with our social profiles (e.g. commenting, sharing, following us, or liking), we will use your data to interact and communicate with you through our social profile in order to propose products and services and develop our "Brand" through the social channel with which you have interacted. We inform you that the information you voluntarily provide us on social profiles and any expressions of interest you may have, will be used exclusively for the purposes of analysis and communication stated in this policy. Also for the purpose of protecting our interests or those of third parties, we reserve the right to request the deletion of comments that are offensive or in violation of any applicable law and, if the conditions are met, to use such comments or posts in order to protect or enforce our rights and/or interests in court.

Method of acquisition: The data are voluntarily provided by you through our social profile.

Basis of lawfulness: We process this data by virtue of our legitimate interest in promoting our brand through social channels and responding to any requests for information - art. 6.1 letter f) of R.E. 2016/679 .

How long we keep your data: We keep your personal data until you delete your account or delete your comment or post in which you have tagged us.

Remember that for privacy purposes the social network is an independent data controller of your personal data and that, as such, it does not operate under our responsibility. The collection and use of the information obtained are governed by the privacy policies of the social network to which we invite you to refer.

Links to external websites

Where we provide links to other websites, we do so solely and exclusively for informational purposes. Other websites are outside of our control and this Policy does not apply. If you access other websites using the links we have provided,

the operators of these sites may collect your data and use it in accordance with their Privacy Policy, which may differ from this Policy.

Security of your personal data

We have taken a number of physical, technical and organisational measures to ensure adequate levels of security for the personal data processed under our control, so as to prevent all reasonably foreseeable risks, including but not limited to their destruction, loss, alteration or unauthorised disclosure or accidental or unlawful access.

The data provided is stored and archived on secure servers in the European Economic Area

If you have a password that allows you to access our web services, it is your responsibility to keep it secure and confidential.

Processing methods and data retention time

Your data will be processed with the support of IT and telematic means and are protected through adequate technical and organizational security measures suitable to guarantee their confidentiality, integrity and availability.

We only retain personal data for as long as necessary to fulfil the purposes for which it was collected or for any other related legitimate purpose. Therefore, if personal data is processed for two different purposes, we will keep such data until the purpose with the longer term ends. However, we will no longer process personal data for the purpose of which the retention period has expired. Personal data that is no longer required, or for which there is no longer a legal basis for its storage, will be anonymised or deleted.

The personal data processed to manage and respond to your requests for information or other communications are kept for the time necessary to manage and respond to your request and subsequently deleted.

Personal data will be processed for marketing purposes until you withdraw your consent, starting from the date of collection of your consent.

Categories of data recipients

Your personal data will be processed by persons authorised and instructed to process it under the direct authority of the Data Controller, who will operate according to the principles of correctness, lawfulness and transparency and protecting the confidentiality of your data through technical and organisational security measures suitable for guaranteeing a level of protection appropriate to the risk. In some cases, your personal data will be communicated to other parties who operate on our behalf as data processors who have been given specific instructions on the processing of your data and whose list you can request from the Data Controller by writing to the address privacy@delcambio.it, including companies that provide us with IT support services, data processing services, etc.

In particular, your data may be communicated exclusively for the purposes specified above to the following recipients:

- companies that provide IT and data processing services (e.g. management and maintenance of IT infrastructures and services, etc.)
- companies and firms that provide consulting services;
- collaborators, consultants and third-party service providers;
- authorities and institutions to which the right to access them is granted by provisions of law or regulations (e.g. public security authorities and police forces).

Payments.

Our online store is hosted on the Shopify platform, which provides us with the e-commerce infrastructure necessary to sell products. The personal data entered during navigation and the purchase process are processed through Shopify's systems, stored on servers protected by adequate security measures. If you use a direct payment gateway (e.g. Shopify Payments) to complete your order, your card details are processed directly by the relevant payment service provider

and, where applicable, by Shopify, in accordance with PCI-DSS. These data are encrypted and stored only for the time strictly necessary to finalize the transaction; Once completed, your payment information is deleted or made unreadable. All direct payment gateways adhere to the PCI-DSS standards established by the PCI Security Standards Council (Visa, MasterCard, American Express, Discover), which ensure the secure handling of card information. We do not store your full payment card information.

For more information about how Shopify processes it, please see Shopify's Terms of Service and Privacy Policy www.shopify.com/it/legal/privacy

Transfer of data abroad.

The Data Controller stores and processes the personal data indicated within the European Union. The Data Controller does not transfer personal data outside the European Union, the European Economic Area; in any case, if the Data Controller, due to any needs related to the headquarters of service providers, needs to transfer data outside the European Union or the European Economic Area to countries for which the European Commission has not issued an Adequacy Decision, the same undertakes to ensure adequate levels of protection and safeguards, including contractual ones, according to the applicable regulations, including the stipulation of standard contractual clauses pursuant to art. 46, par. 2, letter c) of R.E. 2016/679, possibly supplemented by additional technical, legal and organizational measures necessary to ensure that the level of protection of personal data is equivalent to that of the European Union.

Cookies and other technologies.

When you browse the pages of our site, we automatically collect data through the use of "cookies". A cookie is a text file containing small amounts of data that a website can send to your browser, which can then be stored on your computer as a tag that distinguishes your computer but does not identify you. Some of our website pages use cookies to provide you with a better service during subsequent uses of the website. You can set your browser to notify you before you receive a cookie, so that you have the opportunity to decide whether or not to accept it.

We use a plugin to manage your consent to the use of cookies on our website. However, you can also set your browser to disable cookies, please note that if you do this, some pages of our website may not function properly.

Instructions for disabling cookies can be found on the following web pages: Mozilla Firefox - Microsoft Edge - Google Chrome - Opera - Apple Safari.

For information on the specific cookies used on this website, please consult the website's Cookie Policy using the appropriate link in the footer of the website.

Rights of the data subject.

In relation to the processing of your personal data, you will always have the opportunity to exercise the rights provided for by R.E. 2016/679 (Articles 15-21), namely:

- receive confirmation of the existence of personal data and access their content (right of access);
- update, amend and/or correct your personal data (right to rectification);
- request the deletion or limitation of the processing of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or otherwise processed (right to be forgotten and right to limitation);
- object to processing at any time where the processing is based on our legitimate interest (right to object).

In relation to processing based on your consent, where given (by way of example: for marketing purposes), you may withdraw such consent at any time without prejudice to the lawfulness of the processing based on the consent given before its withdrawal.

To exercise your rights, you can send us a communication to the following e-mail address: privacy@delcambio.it.

Additional rights

Without prejudice to the possibility of contacting our Company to exercise the rights related to the processing carried out by us, you may lodge a complaint with the competent independent administrative authority in the Member State of the European Union where you habitually reside, where you work, or where an alleged violation of the law on the

protection of your personal data has occurred. In Italy, you can lodge a complaint with the following supervisory authority: <https://www.garanteprivacy.it>

Forms for exercising your rights

To exercise your rights towards the Data Controller, you can use the following form:

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>

Changes to the Policy

This Policy was updated on 01/10/2025.