

Information on the Processing of Personal Data, pursuant to Article 13 of EU Regulation No. 2016/679 "GENERAL DATA PROTECTION REGULATION" (hereinafter "GDPR"), and Italian Legislative Decree 196/2003 as amended by Legislative Decree 101/2018

With this privacy notice, we wish to inform you about how our Company, ALF S.R.L. (hereinafter the "Company" or "ALF"), processes the personal data collected when you subscribe to our newsletter. This notice is published on the website alfcreative.it, under the Privacy Policy section. Unless otherwise specified, all legal references in this document refer to the GDPR.

1. Data Controller

The Data Controller is ALF S.R.L., with registered office at Via Luigi Einaudi, 7, Alba (CN – 12051), VAT No. 03915050045, and can be contacted by phone at +39 0173 592970.

2. Appointment of RDP – DPO

The Data Controller, not falling under the cases outlined in Article 37 nor in the various interpretations provided by the Supervisory Authority, has deemed it unnecessary to appoint a Data Protection Officer (DPO).

3. Subject of the Processing

The processing is limited to the email address, first and last name (and optionally Company name) collected through the newsletter subscription form on the website or through direct contact with the data subject. The email address is stored in the Data Controller's CRM and in the database used for sending the newsletter, and is used to send institutional and/or commercial communications.

4. Purpose of Processing, Legal Basis, and Nature of Provision

The purpose of the processing referred to in point 3 is to send commercial and/or institutional communications. The processing is optional, lawful pursuant to Article 6, paragraph 1, letter a), and requires your explicit consent.

5. Methods and Duration of Processing

The processing of your personal data related to points 3 and 4 is carried out exclusively by electronic means and involves collection, recording, organization, consultation, selection, use, and deletion. Your personal data are processed electronically and/or automatically, stored until they become obsolete or until you provide different instructions, and are not subject to dissemination.

6. Data Access

Your data may be made accessible, solely for the purposes described in point 4), to employees, collaborators, and partners of the Data Controller in their capacity as authorized data processors and/or system administrators, or to third-party companies or other entities performing outsourced activities on behalf of the Data Controller, in their capacity as external data processors. ALF's policies include a careful selection of both internal and external parties who may have access to your Company's data, based on their skills and full compliance with the security and confidentiality rules imposed by ALF.

7. Data Disclosure

Without the need for explicit consent (pursuant to Article 6, letters b) and c) of the GDPR), the Data Controller may disclose your data referred to in point 3 to supervisory bodies, judicial authorities, and to those parties to whom disclosure is mandatory by law for the purposes described in point 4 or for specific purposes of the requesting entities.

These parties will process the data in their capacity as independent data controllers. Such data will not be disseminated by ALF.

8. Data Transfer

The personal data provided, as referred to in point 3, are stored electronically on servers located at the Data Controller's premises or on servers of the DEM service providers within the European Union. It is understood that ALF may, if necessary, transfer archives and servers to other EU countries or even outside the EU, for example when using Cloud services. In such cases, the Data Controller hereby ensures that any transfer of data outside the EU will comply with applicable legal provisions, including the prior signing of the Standard Contractual Clauses established by the European Commission, and that the Cloud service used will ensure an adequate level of security to guarantee the confidentiality, integrity, and availability of the transferred data.

9. Data Subject Rights

ALF guarantees your Company the exercise of the rights provided by law for data subjects and ensures cooperation in response to specific requests made by data subjects. However, unless otherwise agreed with your Company, ALF does not guarantee the direct exercise of such rights by the data subjects themselves. In the event of such requests, ALF will simply forward the data subject's request to your Company.

Data subjects enjoy the rights set out in Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR. Specifically:

1. Right of access
2. Right to rectification
3. Right to erasure ("right to be forgotten")
4. Right to restriction of processing
5. Right to notification regarding rectification or erasure of personal data or restriction of processing
6. Right to data portability
7. Right to object
8. Rights related to automated decision-making concerning individuals, including profiling

10. Methods for Exercising Data Subject Rights

Data subjects may exercise their rights at any time by sending:

1. A registered letter with return receipt to the Data Controller, as indicated in point 1);
2. An email to the address privacy@alfcreative.it