



PRIVACY STATEMENT
Website Personal Data
Protection EU Regulation
2016/679

DPCY_03

Rev. 00 of 01/04/2019

GENERAL INFORMATION

MENIN ANTONIO E C. FLORICOLTURA soc. agr. semplice has drawn up this Privacy Statement in order to describe how the website www.meninfloricoltura.com handles the personal data of users/visitors and as a prerequisite for access and use of the website. Pursuant to art. 13 of EU Regulation 2016/679, this Privacy Statement is available to anyone who visit the Company's website and use the services on the following address www.meninfloricoltura.com. This Privacy Statement refers only to the above mentioned website and does not apply to other websites that users may access through specific links.

Any updates to this Privacy Statement will be available to all users in the "Privacy" section of this website. If the User does not wish to accept these changes, he/she may interrupt the use of our website. Continued use of our website, products and services following notice of any changes and/or updates constitutes acceptance of those changes and agreement to be bound by the new terms and conditions.

The website www.meninfloricoltura.com is owned by the Company and is managed entirely by it.

DATA CONTROLLER

The Data Controller, which is the entity that makes decisions regarding the methods and purposes of the processing, is

MENIN ANTONIO E C. FLORICOLTURA SOC. AGR. SEMPLICE

with

registered office and operational headquarters in Carceri (PD) – Via Braggio 4, 35040

To contact the Data Controller you can use the following email address privacy@meninfloricoltura.com

PURPOSES OF DATA PROCESSING

MENIN ANTONIO E C. FLORICOLTURA will collect and process only personal data voluntarily disclosed by visitors of this website. Visitors are able to browse the website even without disclosing their personal data and information. Third party systems used to collect information about users, such as IP address, type of Internet browser, operating system and/or web pages visited by a user on our website, do not collect personal data but only anonymous data for statistical or security purposes. Each visitor may choose to provide MENIN ANTONIO E C. FLORICOLTURA with limited personal data as required in order to obtain information about our services. Once registered, the personal data collected will be used only for the services described in this Privacy Statement.

Visitors of this website can provide their personal data to:

request information on services/products, offers and quotes.

MENIN ANTONIO E C. FLORICOLTURA does not intentionally collect through this website special categories of personal data or information relating to criminal convictions and offences or related security measures.

Special category data, pursuant to art. 9 of the EU Regulation 2016/679 (GDPR), include personal data disclosing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership as well as personal data concerning an individual's health, sex life or sexual orientation.



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Judicial data include personal data disclosing, pursuant to Italian law, the measures referred to in article 3, paragraph 1, letters a) to o) and r) to u), of Presidential Decree no. 313 of 14 November 2002 concerning the criminal record office, the register of offence-related administrative sanctions and the relevant current charges, or the status of being either defendant or the subject of investigations pursuant to articles 60 and 61 of the Criminal Procedure Code.

We recommend that you do not provide such information through our website.

DISCLOSURE OF DATA TO THIRD PARTIES

The personal data collected may be disclosed within the EU and transmitted to non-EU countries exclusively for the purposes specified above. To get more information about it, send an e-mail to privacy@meninfloricoltura.com.

Recipients or categories of recipients to whom your personal data may be communicated are other external companies or individuals who perform activities that are strictly connected and instrumental to the business relationship established, such as:

- credit institutions,
- consultants and freelancers, single or associated.

PROCESSING METHODS

MENIN ANTONIO E C. FLORICOLTURA, in its capacity as Data Controller, and each of the external recipients, if any, will handle and store the personal data collected through the use of this website with automated and/or paper-based tools, for the time strictly necessary to achieve the purposes for which they have been collected or voluntarily disclosed by the user. Personal data may be processed within the limits and in accordance with the rules set out in this Privacy Statement by employees and collaborators of the Company appointed responsible for or in charge of the processing, who will receive adequate operating instructions and will operate under the direct authority of the data controller.

SECURITY OF PROCESSING

Specific security measures, as provided for by art. 32 of EU Regulation 2016/679, are applied to protect personal data against loss and improper use. MENIN ANTONIO E C. FLORICOLTURA protects personal data by adopting international security levels as well as security procedures protecting your personal data against:

- Unauthorized access
- Improper use or disclosure
- Unauthorized modification
- Accidental or unlawful loss or destruction

SPECIFIC USE OF PERSONAL DATA

Below you will find specific information regarding particular sections of this website:

Section: Contact request



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The "Contact" section of this website allows to request information about services, products, events and ask for offers and quotes. If you decide to send your personal data, they will be processed exclusively for these purposes by specifically appointed personnel and in accordance with standard internal procedures and will be retained for a maximum period of two years unless different retention periods are provided for by law.

DATA RETENTION

The information and personal data of visitors/users collected from this website, including data freely provided in order to receive information or other materials, will be retained for the sole purpose of providing the requested service and, in any case, in compliance with the general principle of accuracy, fairness, lawfulness, transparency, confidentiality, storage limitation, relevance, data minimisation and proportionality, pursuant to art. 5 of EU Regulation 2016/679, the data will be kept for the time strictly necessary to achieve the purposes of the processing and only for the purposes set out in this Privacy Statement.

RIGHTS OF THE DATA SUBJECT

Pursuant to the provisions of chapter III "Rights of the data subject" of EU Regulation 2016/679, the data subject shall have at any time:

- right to access the data collected and processed– art. 15;
- right to object to the processing of his or her personal data – art. 21;
- right not to be subject to a decision based solely on automated processing – art. 22;
- right to withdraw at any time his or her consent without affecting the lawfulness of processing based on consent before its withdrawal – art. 7;
- right to lodge a complaint with a supervisory authority– art. 77;

as well as all the rights to "rectification and erasure" referred to in Section 3 of EU Regulation 2016/679 shown below.

You may send a written request to the data controller using the following email address privacy@meninfloricultura.com.

MINORS

The website www.meninfloricultura.com is not intended for use by children under the age of 18.

We understand the importance of protecting children's privacy, especially in an online environment, and therefore we do not intentionally collect or keep personal data about children under the age of 18.



**PRIVACY STATEMENT
FOR
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PRIVACY STATEMENT FOR CUSTOMERS/SUPPLIERS

In accordance with EU Regulation 2016/679 concerning the protection of personal data and in particular Article 13, **Menin Antonio e C. Floricoltura soc. agr. semplice** hereby provides the Customer/Supplier with the following information:

DATA CONTROLLER

The Data Controller, which is the entity that makes decisions regarding the methods and purposes of the processing, is **Menin Antonio e C. Floricoltura soc. agr. semplice**, with registered office in Carceri (PD), Via Braggio 4, phone +39 0429 619812, fax +39 0429619750, email info@meninfloricoltura.com.

You can contact the Data Controller by sending an email to privacy@meninfloricoltura.com.

The personal data provided are necessary to fulfill legal obligations.

The data supplied will be processed by manual or automated means, according to art.

32 of EU Regulation 2016/679. In compliance with the general principle of accuracy, fairness, lawfulness, transparency, confidentiality, storage limitation, relevance, data minimisation and proportionality, pursuant to art. 5 of EU Regulation 2016/679, the data will be kept for the time strictly necessary to achieve the purposes for which they were collected and processed.

PURPOSES OF DATA PROCESSING

The data shall be collected and processed by the Company for the entire duration of the contractual relationship established and also subsequently, to perform its ordinary business activities and for the following purposes:

- a) correct and complete establishment of the contractual relationship with the Customer/Supplier and fulfilment of their respective contractual obligations;
- b) to execute the purchase order sent by/to the Customer/Supplier, as well as to allow the Company to carry out all the various administrative, commercial, accounting and fiscal activities deriving from the order/supply;
- c) fulfillment of obligations under applicable laws, regulations, community legislation, as well as orders issued by legally entitled authorities,
- d) improvement and development of the Company's business and its business relationships, also through marketing, promotional, statistical and quality control activities (carried out directly or through third parties and/or specialized companies appointed responsible for or in charge of the processing).

PROCESSING METHODS

Menin Antonio e C. Floricoltura, in its capacity as Data Controller, and each of the external recipients, if any, will handle and store the personal data collected electronically or on paper



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for the time strictly necessary to achieve the purposes for which they have been collected. Your personal data may be processed within the limits and in accordance with the rules set out in this Privacy Statement by employees and collaborators of the Company appointed responsible for or in charge of the processing, who will receive adequate operating instructions and will operate under the direct authority of the data controller.

Specific security measures, as provided for by art. 32 of EU Regulation 2016/679, are applied to protect personal data against loss, improper or incorrect use and unauthorized access.

The Company protects personal data by adopting international security levels as well as security procedures protecting your personal data against:

- improper use or disclosure;
- unauthorized modification;
- accidental or unlawful loss or destruction.

The data will be handled only by personnel authorized by the data controller.

The Company will not carry out profiling on customers nor adopt automated decision-making procedures for such purpose.

DATA RETENTION

The data will be retained for the sole purpose of providing the requested service and, in any case, in compliance with the general principle of accuracy, fairness, lawfulness, transparency, confidentiality, storage limitation, relevance, data minimisation and proportionality, pursuant to art. 5 of EU Regulation 2016/679. The data will be kept for the time strictly necessary to achieve the purposes of the processing and only for the purposes set out in this Privacy Statement and/or subsequently handled in compliance with legal limitation periods.

NATURE OF PERSONAL DATA PROVISION

The provision of personal data is not mandatory but it is nevertheless essential since failure to do so will make it impossible for the Company to establish and/or initiate any contractual relationships with customers/suppliers. The provision of personal data for the purposes referred to in paragraph "Purposes of data processing - letter d)" is instead merely optional and requires the consent of the data subject. If the data subject refuses to provide such consent, he/she may not be included in market researches, analysis and statistical surveys, and may not receive marketing communications and/or promotional offers.

DISCLOSURE OF DATA TO THIRD PARTIES

Your personal data will be communicated to **Menin Antonio e C. Floricoltura** in order to respond to your requests for information, or may be communicated to competent Bodies and Institutes for the fulfillment of legal obligations or to the judicial authority, if requested. The personal data collected may be disclosed within the EU and transmitted to non-EU countries exclusively for the purposes specified above. In addition, the Company uses other entities, companies and individuals to perform certain activities such as sending e-mails, delivering parcels, making payments. Without prejudice to any obligations provided for by law, regulations, EU legislation, as well as by orders issued by legally entitled authorities, your personal data will not be disseminated, but may be communicated to:



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- agents of the company;
- shipping and transportation companies;
- credit and financial institutions;
- factoring companies;
- insurance and credit insurance companies;
- professionals appointed by the Company and/or consultants of the Company;
- service companies, also for sending marketing communications;
- for the sole purpose of credit protection and better management of our rights regarding the single business relationship, your personal data may be communicated to: (i) debt collection companies; (ii) companies that use databases for assessing firms' solvency and/or providing business information; (iii) financial advisors; (iv) legal advisors.

These subjects will only have access to personal data strictly necessary to perform their tasks. They shall not use your personal data for different purposes and shall process them in accordance with this Privacy Statement and the current legislation.

RIGHTS OF THE DATA SUBJECT

Pursuant to the provisions of chapter III "Rights of the data subject" of EU Regulation 2016/679, the data subject shall have at any time:

- right to access the data collected and processed – art. 15;
- right to object to the processing of his or her personal data – art. 21;
- right not to be subject to a decision based solely on automated processing – art. 22;
- right to withdraw at any time his or her consent without affecting the lawfulness of processing based on consent before its withdrawal – art. 7;
- right to lodge a complaint with a supervisory authority – art. 77;

as well as all the rights to "rectification and erasure" referred to in Section 3 of EU Regulation 679/2016 shown below.

You may send a written request to the data controller to the following email address privacy@meninfloricoltura.com.

Section 3 of EU Regulation 2016/679 - Rectification and erasure

Art. 16 - Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Art. 17 - Right to erasure ("right to be forgotten")

1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:
 - a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - b) the data subject withdraws consent on which the processing is based where there is no other legal ground for the processing (eg. resignation);



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- c) the data subject objects to the processing if there is no overriding legitimate grounds for the processing, or if the personal data are processed for marketing purposes;
 - d) the personal data have been unlawfully processed;
 - e) the personal data have to be erased for compliance with a legal obligation to which the controller is subject;
 - f) *..omissis...*
2. Where the controller has made the personal data public and is obliged to erase them, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.
 3. Previous paragraphs shall not apply to the extent that processing is necessary:
 - a) for exercising the right of freedom of expression and information;
 - b) for compliance with a legal obligation which requires processing *...omissis*;
 - c) *...omissis..*;
 - d) *...omissis..*;
 - e) for the establishment, exercise or defence of legal claims.

Art. 18 - Right to restriction of processing

1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
 - a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 - b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 - d) the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.
2. Where processing has been restricted to the purposes described above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.
3. A data subject who has obtained restriction of processing shall be informed by the controller before the restriction of processing is lifted.

Art. 19 - Notification obligation regarding rectification or erasure of personal data or restriction of processing

The controller shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.



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Art. 20 - Right to data portability

1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:
 - a) the processing is based on a contract;
 - b) the processing is carried out by automated means.
2. In exercising his or her right to data portability, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
3. The exercise of the right to data portability shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
4. The right to data portability shall not adversely affect the rights and freedoms of others.