

INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA pursuant to Articles 13 and 14 of EU Regulation 2016/679

PREAMBLE

This information notice is provided pursuant to Articles 13 and 14 of EU Regulation 2016/679 (hereinafter "GDPR" or "Regulation") and the Personal Data Protection Code (Legislative Decree 196/2003), as amended by Legislative Decree 101/2018, to all those who interact in any capacity with the Consorzio di Tutela Barolo Barbaresco Alba Langhe e Dogliani.

DATA CONTROLLER

The Data Controller for the processing of data is:

Consorzio di Tutela Barolo Barbaresco Alba Langhe e Dogliani

Registered office: Corso Enotria, 2/c - Ampelion - 12051 Alba (CN)

Tax Code/VAT Number: 02410110049

Telephone: +39.0173.240112

Email: consorzio.vini@langhevini.it

Certified Email (PEC): consorzio.langhevini@pec.it

CATEGORIES OF DATA SUBJECTS AND PURPOSES OF PROCESSING

The Consortium processes data of different categories of data subjects, for specific purposes and on the basis of distinct legal grounds, as detailed below.

Summary table of processing operations by category of data subjects

| category of data subjects | main purposes | legal basis | data processed |
|-----------------------------|--|---------------------------------------|---|
| Consortium members | Management of consortium relationship, statutory obligations, institutional communications | Art. 6, para. 1, lett. b) and c) GDPR | Personal details, contact information, company data, tax data, bank details |
| Suppliers | Management of contractual relationships, tax and accounting obligations | Art. 6, para. 1, lett. b) and c) GDPR | Personal details, contact information, tax data, bank details |
| Customers/Purchasers | Order management, invoicing, customer service | Art. 6, para. 1, lett. b) and c) GDPR | Personal details, company data, contact information, billing data, tax data, bank details |
| Website visitors | Browsing, management of information requests | Art. 6, para. 1, lett. a) and f) GDPR | Browsing data, contact details |
| Persons interested | Newsletter, event | Art. 6, para. 1, | First name, surname, |

| category of data subjects | main purposes | legal basis | data processed |
|---|----------------|---------------|----------------|
| in the promotional and institutional activities of the Consortium | communications | lett. a) GDPR | email |

PURPOSES AND LEGAL BASES OF PROCESSING - DETAILS BY CATEGORY

Consortium members

A) Management of the consortium relationship

Purpose: management of registration, maintenance of the consortium relationship, exercise of rights and fulfilment of obligations arising from the Consortium's Articles of Association, convening and participation in meetings, exercise of voting rights, institutional communications.

Legal basis: Art. 6, para. 1, lett. b) of the Regulation - performance of a contract to which the data subject is party (membership relationship) - and lett. c) - compliance with legal obligations arising from the legislation on protection consortia.

Data processed:

- Personal details (first name, surname, tax code, date and place of birth)
- Contact details (address, telephone, email, certified email (PEC))
- Company data (company name, registered office, VAT number, legal form)
- Data relating to wine-growing activity (vineyard areas, production, designations)
- Data relating to membership fees and payments
- Data relating to participation in consortium bodies

Nature of provision: mandatory. Refusal to provide the data results in the impossibility of completing or maintaining the consortium relationship.

B) Tax, accounting and administrative obligations

Purpose: issuance and retention of invoices, credit notes, accounting management, management of membership shares, tax and fiscal obligations, management of relations with the tax authorities.

Legal basis: Art. 6, para. 1, lett. c) of the Regulation - compliance with legal obligations to which the Controller is subject (tax and accounting legislation).

Data processed:

- Personal and tax details
- Bank details (IBAN for credits/debits)
- Data relating to economic transactions

Nature of provision: mandatory by law.

C) Institutional functions of protection, promotion and supervision

Purpose: performance of the functions of protection, promotion, enhancement, supervision and general care of interests relating to designations of origin, as provided for by sector-specific legislation.

Legal basis: Art. 6, para. 1, lett. e) of the Regulation - performance of a task carried out in the public interest, in conjunction with Art. 2-ter of the Privacy Code.

Data processed:

- Data relating to wine production
- Data relating to controls and inspections
- Technical and administrative documentation

Nature of provision: mandatory by virtue of the public functions performed by the Consortium.

Suppliers and service providers

A) Management of the contractual relationship

Purpose: selection of suppliers, negotiation, conclusion and performance of contracts for the supply of goods and services, order management, verification of performance, payments.

Legal basis: Art. 6, para. 1, lett. b) of the Regulation - performance of pre-contractual and contractual measures.

Data processed:

- Personal details of the supplier (natural person) or contact persons (legal entity)
- Contact details
- Tax and bank details
- Contractual and administrative documentation

Nature of provision: mandatory for the establishment and performance of the contractual relationship.

B) Tax, accounting and legal obligations

Purpose: issuance and recording of purchase invoices, VAT obligations, obligations as withholding agent, maintenance of mandatory accounting records, document retention. Legal basis: Art. 6, para. 1, lett. c) of the Regulation - compliance with legal and tax obligations.

Data processed: tax, accounting and bank details.

Nature of provision: mandatory by law.

C) Verification of Requirements and Regulatory Compliance

Purpose: verification of integrity requirements, moral suitability and absence of grounds for exclusion for the purposes of contract award, social security contribution regularity (DURC), anti-mafia clearance, regulatory compliance including in relation to tender procedures, compliance with applicable legal provisions on anti-corruption and transparency.

Legal basis: Article 6, paragraph 1, letter c) of the Regulation - compliance with legal obligations, and Article 2-octies of the Privacy Code for any data relating to criminal convictions and offences.

Data processed: Certifications, registry extracts, anti-mafia documentation, tax documentation, criminal records (where required).

Nature of provision: mandatory by law.

Customers and Purchasers

A) Order and Sales Management

Purpose: Receipt and fulfilment of orders, management of sales of products or services offered by the Consortium, customer assistance.

Legal basis: Article 6, paragraph 1, letter b) of the Regulation - performance of the sales contract.

Data processed:

- Personal data Tax data
- Contact details
- Shipping and billing address
- Payment data (through secure third-party systems)

Nature of provision: mandatory for the performance of the contract.

B) Invoicing and Tax Compliance

Purpose: issuance of invoices, transport documents, VAT and tax compliance.

Legal basis: Article 6, paragraph 1, letter c) of the Regulation - compliance with legal obligations.

Data processed: personal data, company data, tax and invoicing data.

Nature of provision: mandatory by law.

C) Information and Direct Marketing (only with prior consent)

Purpose: sending of commercial communications, promotional materials, newsletters on products, services, events and initiatives of the Consortium.

Legal basis: Article 6, paragraph 1, letter a) of the Regulation - consent of the data subject.

Data processed:

- Personal data
- Contact details

Nature of provision: optional. Consent may be withdrawn at any time without affecting the lawfulness of processing based on consent given before withdrawal.

Website Visitors

A) Website Navigation

Purpose: To allow access to the website content, ensure its proper technical functioning, analyse usage patterns to improve user experience.

- Personal data
- Contact details

Nature of provision: optional. Consent may be withdrawn at any time without affecting the lawfulness of processing based on consent given before withdrawal.

Website Visitors

A) Website Navigation

Purpose: To allow access to the website content, ensure its proper technical functioning, analyse usage patterns to improve user experience.

Legal basis: Article 6, paragraph 1, letter f) of the Regulation - legitimate interest of the Controller or third parties.

Data processed:

- Browsing data (IP address, browser type, operating system, pages visited, visit duration, referral source)

- Technical cookies (for website functioning)

Nature of provision: automatic during navigation.

Note: for the use of analytical and profiling cookies, please refer to the specific Cookie Policy.

B) Information Requests through Contact Forms

Purpose: To handle information requests submitted through the contact channels and tools available on the website.

Legal basis: Article 6, paragraph 1, letter b) of the Regulation - performance of pre-contractual measures taken at the request of the data subject.

Data processed:

- Browsing data (IP address, browser type, operating system, pages visited, visit duration, referral source)

- Personal data

- Contact details (email address, telephone number, content of the request).

Nature of provision: voluntary. Refusal results in the inability to process the request.

Parties Interested in Promotional and Communication Activities

A) Newsletter and Institutional Communications

Purpose: Sending of newsletters, communications on events, tastings, exhibitions, cultural and promotional initiatives organised or sponsored by the Consortium.

Legal basis: Article 6, paragraph 1, letter a) of the Regulation - consent of the data subject.

Data processed:

- Personal data

- Contact details

Nature of provision: optional. Consent may be freely withdrawn at any time through the unsubscribe link included in each communication or by writing to consorzio.vini@langhevini.it

B) Event Participation

Purpose: management of registrations and participation in events, exhibitions, training courses, tastings organised by the Consortium.

Legal basis: Article 6, paragraph 1, letter b) of the Regulation - performance of pre-contractual or contractual measures.

Data processed:

- Personal data
- Contact details
- Dietary or health requirements voluntarily communicated
- Payment data (through secure third-party systems)
- Tax data

Nature of provision: necessary for participation in the event.

PROCESSING METHODS

Personal data are processed by means of IT, electronic and manual tools, with logic strictly related to the purposes indicated and, in any case, in such a way as to ensure the security and confidentiality of the data themselves.

The Consortium adopts all appropriate technical and organisational security measures provided for by Article 32 of the Regulation in order to ensure a level of security appropriate to the risk, including:

- The ability to ensure the confidentiality, integrity, availability and resilience of systems
- The ability to restore the availability and access of data in a timely manner in the event of an incident
- Procedures to regularly test, verify and evaluate the effectiveness of security measures

Processing is carried out by authorised persons, specifically designated and instructed by the Controller pursuant to Article 2-quaterdecies of the Privacy Code.

RETENTION PERIOD

Personal data will be retained for the time strictly necessary to achieve the purposes for which they were collected, in compliance with the principles of minimisation and storage limitation.

Table of Data Retention Periods

| Data Category | Purpose | Retention Period |
|--------------------------|---------------------------|--|
| Consortium members' data | Consortium relationship | For the entire duration of the relationship and subsequently for 10 years (civil and tax limitation periods) |
| Suppliers' data | Contractual relationships | For the entire duration of the contract and subsequently for 10 years |
| Tax and accounting data | Tax compliance | 10 years from registration (Article 2220 of the Civil Code and tax legislation) |
| Customers' data | Sales and invoicing | 10 years from the last transaction |

| Data Category | Purpose | Retention Period |
|------------------------|-------------------------|--|
| Browsing data | Website functioning | Maximum 90 days except where necessary for the detection of offences |
| Information requests | Request management | For the period necessary to process the request |
| Newsletter | Comunicazioni marketing | Until withdrawal of consent |
| Legal proceedings data | Protection of rights | Until final resolution of the dispute and expiration of appeal deadlines |

Upon expiration of the retention periods, the data shall be deleted or irreversibly anonymized.

RECIPIENTS OF DATA

Personal data may be disclosed, for the purposes indicated above, to the following categories of recipients:

A) Data Processors (Article 28 of the Regulation)

- IT and hosting service providers
- Email and newsletter service providers
- Event organizers
- Consultants and professionals (accountants, lawyers, labor consultants)
- Document management and archiving companies
- Payment service providers
- Maintenance and technical assistance companies
- Such parties are appointed as Data Processors pursuant to Article 28 of the

Regulation and process data exclusively in accordance with the Controller's instructions.

B) Parties authorized by legal obligation

- Public authorities (Tax Agency, Financial Police, INPS, INAIL, AGEA)
- Supervisory and control bodies (Ministry of Agricultural Policies, ICQRF, OLAF, AGEA CONTROL)
- Judicial authorities and law enforcement agencies
- Certification bodies for designations of origin

C) Other parties

- Banking and financial institutions for payment processing
- Insurance companies
- Social security and welfare institutions

Personal data shall **not be subject to dissemination**, except as provided by specific legal provisions.

TRANSFER OF DATA TO THIRD COUNTRIES

Personal data are processed at the Consortium's premises and on servers located within the European Union.

Should it become necessary to transfer data to third countries (non-EU) or international organizations, such transfer shall occur exclusively in compliance with the safeguards provided by Chapter V of the Regulation (Articles 44-50), in particular by means of:

- Adequacy decisions of the European Commission (Article 45 of the Regulation)
- Appropriate safeguards such as standard contractual clauses approved by the Commission (Article 45 of the Regulation)
- Binding Corporate Rules

In any case, the data subject has the right to obtain information on the appropriate safeguards relating to the transfer of their data.

RIGHTS OF THE DATA SUBJECT

The data subject may obtain from the Data Controller, in the cases and according to the procedures provided by the Regulation, the following rights:

Table of data subject rights

| Right | Legal reference | Content |
|--------------------------------------|------------------------|---|
| Right of access | Article 15 GDPR | To obtain confirmation as to whether or not personal data are being processed and, where that is the case, to obtain access to the data and information concerning the processing |
| Right to rectification | Article 16 GDPR | To obtain the rectification of inaccurate personal data and the completion of incomplete data |
| Right to erasure | Article 17 GDPR | To obtain the erasure of personal data ("right to be forgotten") in the cases provided by the legislation |
| Right to restriction | Article 18 GDPR | To obtain restriction of processing in the cases provided by the legislation |
| Right to data portability | Article 20 GDPR | To receive in a structured, commonly used and machine-readable format the data provided to the Controller and to transmit them to another Controller |
| Right to object | Article 21 GDPR | To object at any time to processing based on the legitimate interest of the Controller or for direct marketing purposes |
| Right to withdraw consent del | Article 7, par. 3 GDPR | To withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal prestato, senza |

| Right | Legal reference | Content |
|-----------------------------------|-----------------|---|
| consenso | | pregiudicare la liceità del trattamento precedente |
| Right to lodge a complaint | Article 77 GDPR | To lodge a complaint with the Supervisory Authority for the protection of personal data |

PROCEDURES FOR EXERCISING RIGHTS

To exercise the rights listed above, the data subject may send a request to the Data Controller using the following channels:

By email: consorzio.vini@langhevini.it

By certified email (PEC): consorzio.langhevini@pec.it

By ordinary mail: Corso Enotria, 2/c - Ampelion - 12051 Alba (CN)

The request must contain:

- Full particulars of the applicant
- Copy of a valid identity document
- Description of the right to be exercised
- Contact details for the response

The Controller shall provide a response to the request within one month of receipt. Such period may be extended by two months in case of particular complexity of the request, by providing reasoned communication to the data subject within the first month.

The response is provided **free of charge**.

RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY

Without prejudice to any other administrative or judicial remedy, the data subject who considers that the processing concerning them infringes the Regulation has the right to lodge a complaint with the Supervisory Authority for the protection of personal data, pursuant to Article 77 of the Regulation.

Italian Data Protection Authority

Piazza Venezia n. 11 - 00187 Rome

Telephone: +39 06.696771

Fax: +39 06.69677.3785

Email: garante@gpdp.it

Certified email (PEC): protocollo@gpdp.it

Website: www.garanteprivacy.it

Alternatively, the data subject may bring proceedings before the ordinary judicial authority pursuant to Legislative Decree 150/2011.

AUTOMATED DECISION-MAKING AND PROFILING

The Consortium **does not adopt automated decision-making processes** nor does it carry out **profiling** activities pursuant to Article 22 of the Regulation.

SOURCE OF PERSONAL DATA

Personal data processed by the Consortium are collected:

- Directly from the data subject: through completion of paper or online forms, sending

of emails, delivery of documents, telephone communications, participation in events

- From publicly accessible sources: company registers, professional registers, public lists

- From third parties: other members of the Consortium, public bodies, certification bodies, service providers

Where data are not collected directly from the data subject, the Consortium provides the information referred to in Article 14 of the Regulation within a reasonable period and in any event within one month of collection, subject to the exceptions provided for by the applicable legislation.

CONSEQUENCES OF FAILURE TO PROVIDE PERSONAL DATA

The provision of personal data for the above purposes is mandatory as it is necessary for:

- The establishment and performance of the consortium relationship or contractual relationship

- The fulfilment of legal obligations

The refusal to provide such data results in the impossibility of proceeding with the relationship or fulfilling legal obligations.

An exception is the provision of data for marketing purposes, which is optional and refusal does not entail consequences for the main relationship.

DATA BREACH - PERSONAL DATA BREACH

In the event of a personal data breach likely to result in a risk to the rights and freedoms of data subjects, the Consortium shall:

1. **Notify the breach to the Supervisory Authority** within 72 hours of becoming aware of it, pursuant to Article 33 of the Regulation

2. **Communicate the breach to the data subject** without undue delay, where the breach is likely to result in a high risk to the rights and freedoms of natural persons, pursuant to Article 34 of the Regulation

The Consortium maintains a register of personal data breaches, including the facts, effects and remedial measures adopted, as provided for in Article 33, paragraph 5 of the Regulation.

RECORD OF PROCESSING ACTIVITIES

The Consortium maintains a record of processing activities carried out under its responsibility, pursuant to Article 30 of the Regulation, containing all the information required by the applicable legislation.

COOKIES AND SIMILAR TECHNOLOGIES

For detailed information on the use of cookies and similar technologies on the Consortium's website, please refer to the specific Cookie Policy accessible at the following link: <https://www.iubenda.com/privacy-policy/72970196/cookie-policy> .

UPDATES TO THE PRIVACY NOTICE

This privacy notice may be updated periodically to adapt it to regulatory or organisational changes. The latest version is always available on the Consortium's website.

Data subjects will be informed of any substantial changes by direct communication (for members, suppliers and customers) or by notice on the website.

CONTACTS

For any information relating to the processing of personal data or to exercise the rights provided for by the Regulation, the Consortium may be contacted at the details indicated in this privacy notice.