

#### PRIVACY POLICY

In compliance with the obligations prescribed by national legislation (Italian Legislative Decree No. 196 of 30 June 2003, the Data Protection Code, as amended) and European legislation (European General Data Protection Regulation No. 679/2016, GDPR), this site respects and protects the privacy of visitors and users, implementing every possible and proportionate effort not to infringe users' rights.

The website www.limoncello.com is owned by Limoncello di Capri S.r.l., via Roma 89, 80073 Capri (NA), Italy.

The information is provided by Limoncello di Capri S.r.l. only for the website mentioned above and not for other websites or sections/pages/spaces owned by third parties that the user may consult through specific links.

Users/visitors are asked to read this Privacy Policy carefully before submitting any type of personal information and/or filling in any electronic form on the website itself.

If users/visitors are required to provide their personal data to access certain services, specific and detailed information on the relative processing will be published on the pages relating to the individual services, pursuant to Article 13 of Italian Legislative Decree 196/2003 and the European General Data Protection Regulation No. 679/2016, GDPR, which will specify the limitations, purposes and methods of the processing itself.

#### 1. Data controller

The data controller is Limoncello di Capri S.r.l. with registered office in via Roma 89, 80073 Capri (NA), Italy, Tax Code/Vat No. 07844520630.

Any request relating to personal data processed by Limoncello di Capri S.r.l. can be addressed in writing to the email address info@limoncello.com.

### 2. Data processor

Acoora S.r.l., in the person of its legal representative, with registered office in Rome, Via Luca Gaurico, 9 - VAT No. 11851441003 amministrazione@acoora.com.

## 3. Data voluntarily submitted by users

If users/visitors connecting to this website submit their personal data to access certain services, or to make requests via email, the data will be acquired by Limoncello di Capri S.r.l. and/or third parties with

which Limoncello di Capri S.r.l. may provide the service requested by the user/visitor; this data will be processed exclusively to respond to the request, or to provide the service in accordance with this Policy and the specific Privacy Policy provided at the time of subscription to individual services. The personal data expressly provided by users/visitors will be disclosed to third parties only if this is necessary to comply with the requests of the users/visitors themselves, without prejudice to the provisions of the specific Policies for the individual services.

#### a. Purpose of the processing for profiling purposes

With the data subject's specific consent, Limoncello di Capri S.r.l. may use data provided voluntarily to improve the services offered according to its customers' needs and to obtain information on commercial behaviour and habits.

The profiling activity concerning individuals or groups may be performed through processing customer identification data through a relationship between the data that enables identification of the data subjects and analytical indications relating to their personal sphere (tastes, preferences, habits, needs and consumer choices). The data will be processed electronically or digitally. The processing methods will be relevant and not excessive in relation to the type of services rendered.

For processing data related to profiling, it is mandatory to acquire specific and separate consent from the data subject, who is informed as of now that this provision is entirely optional and any refusal will not entail any consequence (apart from preventing data processing for profiling purposes).

#### b. Purpose of the processing for direct marketing purposes

With the data subject's specific consent, Limoncello di Capri S.r.l. may use the data provided voluntarily for direct marketing activities, to develop studies, research or market statistics; send advertising and informational material; perform direct sales or placement of products or services; send commercial information; provide interactive commercial communications. For data processing aimed at conducting direct marketing activities, it is mandatory to acquire specific and separate consent from the data subject, who is informed as of now that this provision is entirely optional and any refusal will not entail any consequence (apart from preventing data processing for direct marketing purposes).

For certain forms of communication by email, fax, automated call systems and MMS or SMS messages or other types, the need for specific and separate consent is also prescribed by specific provisions regarding unwanted communications or distance selling (Italian Legislative Decree 196/2003 and the GDPR). Also in the latter cases, data submission is entirely optional and any refusal will have no consequence (apart from preventing data processing).

## 4. Rights of data subjects

Data subjects have the right at any time to obtain confirmation of the exists of their data and to know its content and origin, verify its accuracy or request its integration, updating or rectification (Italian Legislative Decree 196/2003 and the GDPR).

By virtue of this article, users have the right to obtain confirmation of the existence of personal data concerning them, even if not yet recorded, and its provision in an intelligible form.

They also have the right to obtain information on the following aspects:

- (a) origin of the personal data;
- (b) purposes and methods of processing;
- (c) logic applied in the case of processing performed with the aid of electronic tools;
- (d) identification details of the data controllers, the data processors and the representative appointed pursuant to Article 5, paragraph 2;
- (e) parties or categories of parties to whom personal data may be communicated or who can learn about it as the appointed representative in the territory of the State, managers or agents.

The user also has the right to obtain:

- (a) updating, rectification or, when desired, integration of data;
- (b) cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including data which need not be kept for the purposes for which it was collected or subsequently processed;
- (c) attestation that the operations referred to in points a) and b) have been brought to the attention, including, regarding their content, persons to whom the data has been disclosed or disseminated, except when this fulfilment proves impossible or involves using means that are manifestly disproportionate to the protected right.

Finally, the users have the right to object, in whole or in part:

- (a) for legitimate reasons, to the processing of personal data concerning them, even if pertinent to the purpose of collection;
- (b) to the processing of personal data concerning them for the purpose of sending advertising materials or direct selling or for conducting market research or commercial communication.

The rights prescribed by Italian Legislative Decree 196/2003 and the GDPR may be exercised by writing to info@limoncello.com, Limoncello di Capri S.r.l. S.S. 145 KM 21,512, 80062 Meta (NA), Italy.

#### 5. Duration of processing

The duration of the processing is to be understood as lasting until the request for its cancellation or restriction.

## 6. Processing methods

Your personal data will be processed using suitable paper, electronic and/or digital methods, strictly for the aforementioned purposes and, in any case, in such a way as to guarantee the security and confidentiality of the data itself.

### 7. Data processing location

The processing connected to the web services of this website is conducted at the aforementioned headquarters of the company Limoncello di Capri S.r.l. and is only handled by personnel assigned to processing, or by any persons assigned to occasional maintenance operations.

Data deriving from the web service may be forwarded to the technological and instrumental partners used by the "Data Controller" to provide the services requested by visitors. The personal data provided by the visiting users, who send requests for informational material (requests for information, answers to questions, etc.) or other communications (orders), is used for the sole purpose of carrying out the service or provision requested and is disclosed to third parties only if necessary for this purpose (providing the requested services through the technological and instrumental partner).

### 8. Consent

Full awareness of this policy will be required from you when registering for a service and/or on the website if necessary. Here you will be asked to give your consent to the processing by Limoncello di Capri S.r.l.

# 9. Browsing data and cookies

Regarding the use of cookies, we refer you to the specific policy on their use.