

PRIVACY NOTICE AND PRIVACY POLICY FOR CUSTOMERS

(pursuant to Articles 13 and 14 of EU Regulation 2016/679 – “GDPR”)

1. Data Controller

The Data Controller is **Orologeria Luigi Verga Srl**, with registered office at Via Dogana 3 – 20123 Milan, VAT No. 04370140156, e-mail: info.amministrazione@verga1947.it, certified e-mail (PEC): luigivergaspa@pec.it

(hereinafter, the “Data Controller”).

2. Types of Data Processed

The Data Controller may process the following personal data, depending on the method of contact (physical store or website):

- Personal and contact details (first name, last name, address, telephone number, e-mail address);
- Tax and payment information (tax identification number, VAT number, bank account details);
- Purchase and warranty-related data;
- Browsing data (IP addresses, access logs, browser and device type);
- Data provided through online forms (contact requests, newsletter subscriptions);
- Cookies and other tracking technologies (see Section 9).

3. Purposes and Legal Basis for Processing

Purpose	Legal basis
a) Management of sales, invoicing, warranties and after-sales assistance	Performance of a contract (Art. 6(1)(b) GDPR)
b) Compliance with tax, accounting or administrative obligations	Legal obligation (Art. 6(1)(c) GDPR)
c) Management of requests for information or quotations submitted through the website	Taking steps prior to entering into a contract (Art. 6(1)(b) GDPR)
d) Sending communications regarding products similar to those already purchased (“soft spam”)	Legitimate interest of the Data Controller (Art. 6(1)(f) GDPR)
e) Sending newsletters or personalised promotional communications	Express consent of the data subject (Art. 6(1)(a) GDPR)
f) Anonymous statistical analysis of website visits	Legitimate interest of the Data Controller (Art. 6(1)(f) GDPR)
g) Protection of the Data Controller’s rights (e.g. management of disputes or complaints)	Legitimate interest of the Data Controller (Art. 6(1)(f) GDPR)

4. Processing Methods

Personal data are processed using electronic, telematic and paper-based means, in compliance with the principles of fairness, lawfulness and transparency.

Appropriate technical and organisational security measures are adopted to protect data against unauthorised access or improper use.

5. Mandatory or Optional Nature of Data Provision

- The provision of data for contractual and legal purposes (points a–b–c) is mandatory. Without such data, it will not be possible to complete the purchase or provide the requested services.
- The provision of data for marketing purposes (points d–e) is optional and consent may be withdrawn at any time.

6. Recipients of the Data

Personal data may be disclosed to:

- tax, accounting or legal consultants;
- credit institutions and payment service providers;
- IT companies managing point-of-sale systems, e-commerce platforms or hosting services;
- service centres or suppliers providing warranty and repair services;
- public entities or competent authorities, within the limits provided by law.

The data will not be disseminated or transferred to third parties for unauthorised commercial purposes.

7. Transfer of Data Abroad

Data are processed within the European Economic Area (EEA).

Any transfers to countries outside the EEA will be carried out in compliance with Articles 44 et seq. of the GDPR, with appropriate security safeguards.

8. Data Retention Period

- Contractual and tax data: **10 years** from the termination of the relationship.
- Marketing and newsletter data: until consent is withdrawn.
- Contact data relating to online requests: for the time necessary to respond to and manage the request.

9. Cookies and Browsing Data

The website uses technical cookies necessary for its operation and, subject to consent, analytical or profiling cookies (e.g. Google Analytics, Meta Pixel).

10. Data Subject Rights

The data subject may exercise, at any time, the rights provided for under Articles 15–22 of the GDPR, including in particular:

- the right to access their personal data;
- the right to rectification or erasure;
- the right to restriction of or objection to processing;
- the right to data portability;
- the right to withdraw consent.

Requests must be sent to:

 info.amministrazione@verga1947.it

11. Minors

The Data Controller's services are not intended for persons under 18 years of age. Any data relating to minors will only be processed with the consent of their parents or legal guardians.

12. Updates to this Privacy Notice

This privacy notice may be updated at any time. The most recent version will be available at the point of sale and on the website www.verga1947.it.