

## “Newsletter” privacy policy



### 1. Data Controller

**Radiatori 2000 S.p.A.**, with registered offices at Via Francesca, 54/A - 24040 Ciserano (BG), Tax ID Code and VAT reg. no. 03554100176, hereinafter “Controller”, guarantees full compliance with data protection regulations, and provides the following information with regard to data processing, pursuant to Art. 13, EU Regulation 2016/679 (General Data Protection Regulation – GDPR) and subsequent amendments.



### 2. Data processed, purposes and legal grounds for processing

Personal data are provided, voluntarily, by the user, collected via the newsletter platform, and processed for the following purposes:

- a) with specific consent, to receive, via printed mail, telephone, email, text, or messaging app, communications pertaining to the cultural activities of the Controller, invitations to events as well as news about our activities and announcements about publications;
- b) with specific consent, to receive, via printed mail, telephone, email, text, or messaging app, to invitations to take part in statistical surveys.

In the interests of complete information, we would like to point out that when sending messages, the Data Controller makes use of the newsletter delivery platform MailUp (TeamSystem S.p.A.), which, using statistical tracking systems (for example, web beacons, pixels, etc.), consents to detect the opening of a message, clicks on hypertext links in mail messages, the IP address or browser type used to open the mail, and other similar details.

The collection of these data depends on the use of the platform and constitutes an integral part of the functionality of the message sending system.

It is possible to find information about data use and compliance with the GDPR of the newsletter delivery platform MailUp [here](#) and [here](#).

The legal basis to legitimise the processing of these data regarding the aims set out is the consent of the data subject.

#### Sede

Via Francesca, 54/A  
24040 Ciserano (BG) - Italy

#### Telefono e Fax

T. +39 035 4810174  
F. +39 035 4821852

#### Email e PEC

radiatori@radiatori2000.it  
PEC pec@pec.radiatori2000.it



### 3. Nature of provision

The provision of data for the purposes as stated in point 2 is optional, and the use of said data depends on explicit consent.

Any refusal will prevent the Data Controller from sending newsletters and advertising material or invitations to Controller's events and initiatives.



### 4. Processing locations and methods and data retention times

The data collected from the website are processed at the registered offices of the Data Controller and at the data centres belonging to the MailUp newsletter delivery platform, lawfully named as Data Processor; the data will also be processed at the headquarters of third parties, also appointed as Data Processors, or, as required, by all those subjects necessary for the correct performance of the purposes set out in point 2.

We also inform you that it is possible to find information concerning the use of data and compliance with the GDPR by the newsletter delivery platform MailUp [here](#) and [here](#).

Data collected will be processed using electronic or in any case, automated or computerised or telematic means, or using manual processing with logic strictly related to the purposes for which said personal data were collected and, in any case, in such a way as to guarantee the security of same.

Data are retained for the time strictly necessary to the purpose for which they were processed ("storage limitation principle", Art.5, EU Regulation 2016/679), or until consent is withdrawn or in compliance with the expiry set out in current standards or obligations set down by law.



### 5. Authorised subjects, data processors and data communication

The processing of data collected is performed by the Data Controller's internal staff, appointed for this purpose and authorised to perform processing according to specific instructions issued in compliance with current regulations.

The data collected, within the limits pertaining to the treatment purposes stated and in the event it is necessary or useful to the achievement of the purposes, data can be processed by third parties, appointed external Data Processors or, as required, communicated to same as autonomous controllers and precisely, companies, entities, associations that perform services connected and instrumental to the performance of the above purposes (e.g., analysis and market research services, marketing consultancy, etc.).

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The data collected can be provided, in the event of lawful request, solely in the cases envisaged by law, by the Legal Authority.

Under no circumstances will your data be circulated in any way.



## 6. Data transfer to non-EU countries

Data can be transferred to non-EU countries and specifically, to the United States, only subsequent to checks of the Standard Contractual Clauses adopted/approved by the European Commission, pursuant to Art. 46, par. 2, lett. c) and d) of the GDPR or binding standards for the company as per Art. 47 of the GDPR or, if not, according to one of the derogating measures, as stated in Art. 49 of the GDPR.

The transfer to the United States is authorised according to the specific agreement known as the EU-US Data Privacy Framework (available [here](#)), for which no further consent is required.



## 7. Data subject's rights

With regard to the personal Data communicated, the Data subject has the right to exercise the following rights:

- a. (Art. 7.3 Regulation EU 679/2016 – GDPR) withdrawal of consent;
- b. (Art. 15 Regulation EU 679/2016 – GDPR) accessing and asking for a copy;
- c. (Art. 16 Regulation EU 679/2016 – GDPR) requesting correction;
- d. (Art. 17 Regulation EU 679/2016 – GDPR) requesting deletion (“right to be forgotten”);
- e. (Art. 18 Regulation EU 679/2016 – GDPR) obtaining data minimisation;
- f. (Art. 20 Regulation EU 679/2016 – GDPR) receiving data in a structured format, commonly used and readable from an automatic device, for the purposes of exercising the right to portability;
- g. (Art. 21 Regulation EU 679/2016 – GDPR) opposing processing.

The data subject can exercise their rights as well as ask for more information about their Personal Data, by sending an email to [radiatori@radiatori2000.it](mailto:radiatori@radiatori2000.it) and specifying the content of their request in the subject line.

Requests concerning the Data subject's choice to avail of their rights will be issued without undue delay and, in any case, within one month of the request; only in particularly complex cases and large number of requests, may this be extended by a further 2 (two) months.

Please remember that it is your right (as per art. 77 Regulation EU 679/2016 – GDPR) to submit a complaint to the Data Protection Authority, whose contact information is available [here](#)

*Latest update: 06 May 2024*

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