

1. PRIVACY NOTICE FORM

Pursuant to Article 13 of the General Data Protection Regulation (GDPR)

Dear Customer,

We would like to inform you that the **European Regulation 679/2016** concerning the protection of individuals regarding the **Processing of Personal Data** and the free circulation of such data (hereinafter referred to as **GDPR**) establishes safeguards for individuals and other entities in relation to personal data processing.

1. Data Controller

The **Data Controller** is **International Wine Agency**, located at **Castellana 43, 30030 Martellago (Ve)**, VAT & Tax Code: **03279320273 001616**.

The Data Controller can be contacted at:

Phone: +39 041/5286950

Fax: +39 041/4433827

Email: info@wineagency.eu

2. Categories of Collected Data

The personal data collected primarily include:

Personal Information: Name, surname, gender, age/date of birth, country of origin, and any other personal data permitted by applicable laws.

Contact Information: Address, email address, phone number, fax number, and other contact details permitted by applicable laws.

Consumer Habits & Preferences: Data related to purchases, activity records, customer relationship management information, and buying habits/preferences permitted by law.

3. Source of Personal Data

The personal data held by **International Wine Agency** is voluntarily and spontaneously provided by the data subject.

4. Purpose of Data Processing

Personal data will be processed for the following purposes:

Purpose 1: Responding to inquiries or requests from the data subject, providing information/quotes, offering support for purchased products/services, resolving service-related issues, and collecting customer feedback for service improvement.

Purpose 2: Subscription to **newsletters/ mailing lists**, sending **informational, educational, and commercial communications**, managing **customer profiling activities**, conducting **statistical analysis and market research**.

Additionally, your data may be collected, processed, and stored due to legal or contractual obligations, or if necessary for the **execution of a contract** or **requested service provision**.

Below is a summary table detailing each purpose, its legal basis, data categories, retention period, and recipient categories:

Purpose	Legal Basis	Categories of Personal Data	Retention Period	Recipients
Purpose 1	Consent	Identification & demographic data	Retained as long as necessary to fulfill the request, unless extended due to ongoing service relationships.	Internal use only*
Purpose 2	Consent	Identification & demographic data	24 months from consent unless revoked earlier.	Internal use only*

*For more details on data recipients, refer to the relevant privacy policies.

5. Data Processing Methods

The term "**Personal Data**" in this Privacy Notice refers to any information that enables **International Wine Agency** to identify an individual, directly or indirectly. Personal data processing will be carried out in compliance with **Regulation (EU) 2016/679**. The Company reserves the right to further process data if required by law, investigations, or judicial proceedings.

6. Data Recipients

Within the limits of the above processing purposes, your data may be shared with:

Affiliated companies, subsidiaries, or companies owned/linked to **International Wine Agency**.

Consulting firms (legal, administrative, tax, or IT services).

Accounting and payroll consultants.

Public authorities such as **INPS, INAIL, CCIAA**, or other regulatory entities.

IT service providers, cloud computing providers, or analytical/statistical service providers.

Your data **will not be disclosed to unauthorized third parties** and will not be made publicly available. The **Privacy Document** detailing all responsible parties and data processors is updated periodically and available upon request.

7. International Data Transfers

Your data will **not** be transferred or shared with third parties located in **non-EU countries** that are not GDPR-compliant or deemed unsafe by the European Commission.

8. Data Security & Confidentiality

International Wine Agency has implemented appropriate measures to protect personal

data from **accidental loss, unauthorized access, misuse, modification, or disclosure.**

In the **unlikely event** that the Company believes a security breach involving personal data has occurred, **affected individuals will be notified** as required by applicable laws.

9. Data Retention Period

Personal data will be retained **only for the time necessary** to fulfill the specified processing purposes, in compliance with **Article 5 of the GDPR (data minimization and storage limitation principles)**. Periodic reviews will be conducted to ensure that retained data remains relevant and necessary.

10. Data Subject Rights

Under **Articles 15-22 of the GDPR**, you have the following rights:

a) **Right of Access** – You may request confirmation of whether your data is being processed, along with the following details:

- Processing purposes

- Data categories

- Recipients

- Data retention period

- Right to rectification or erasure

- Right to object to processing or automated decision-making

b) **Right to Rectification or Erasure** – You may request corrections or deletions of inaccurate or outdated data.

c) **Right to Restriction of Processing** – You may limit processing under certain conditions.

d) **Right to Object** – You may object to data processing, including **profiling** based on your particular situation. **International Wine Agency** will cease processing unless **compelling legitimate grounds** override your interests or for **legal claims defense**.

e) **Right to Data Portability** – If processing is **automated** and based on **consent or a contract**, you have the right to receive your data in a structured, machine-readable format.

f) **Right to Withdraw Consent** – You may withdraw consent at any time by notifying the Data Controller. **Past processing remains lawful even after consent withdrawal.**

g) **Right to File a Complaint** – If you believe your rights have been violated, you may file a complaint with the **Italian Data Protection Authority**:

Website: www.garanteprivacy.it

11. Contacting the Data Controller

For any questions or to exercise your rights, contact:

International Wine Agency

Castellana 43, 30030 Martellago (Ve)

VAT & Tax Code: 03279320273 001616

Phone: +39 041/5286950

Fax: +39 041/4433827

Email: info@wineagency.eu

Requests for data access, modifications, or objections will be processed **promptly**, and in any case, within **one month** of receipt. This period may be extended by **two additional months** in complex cases.

12. Accuracy & Data Updates

To provide the best service, you are encouraged to regularly review and update your personal data.

13. Data Submission Requirements

Providing personal data is:

Mandatory for certain fields (marked with an asterisk *). Failure to provide this data may result in an inability to process the request or provide services.

Optional for other fields.

14. Modifications & Updates

This Privacy Notice is **effective as of the date indicated above**.

International Wine Agency reserves the right to modify or supplement this policy as a result of **legal or operational changes**.

For an updated version, please refer to: info@wineagency.eu.

Last updated: January 7, 2025