PRIVACY POLICY BUSINESS CONTACTS
Information notice pursuant to art. 13 Regulation (EU) 2016/679

Thank you for joining Lunelli Group, ambassador of the Italian Art of Living around the world.

The following information applies to each of the **brands and/or companies belonging to the Lunelli Group**, viz. **FERRARI TRENTO**, **TENUTE LUNELLI**, **SURGIVA**, **SEGNANA**, **BISOL 1542**, **TASSONI**, **LOCANDA MARGON** and **GRUPPO LUNELLI**, brands and companies that the Lunelli family has chosen to complement **FERRARI TRENTO** (for more information please visit https://www.ferraritrento.com/en/lunelli-group/).
For this reason, in accordance with current privacy legislation, the data controllership belongs to Ferrari Trento (Ferrari F.lli Lunelli Spa) which determines the purposes and means of the processing of personal data and may send you – on the basis of the relationship with you, as described in this document, and until your objection – institutional communications, news, invitations to events, presentations, press conferences about the brands of Lunelli Group.
Furthermore, Ferrari Trento may send you - previous your consent in accordance with this policy - communications related to Lunelli Group brands. If you have provided Ferrari Trento with this consent, you will have the opportunity to be informed only in relation to the brands for which you expressed interest. Ferrari will also give you this option for profiling, which relies on a specific and separate consent. Such consents are optional: without them, Ferrari Trento will send you only institutional communications on the basis of your relationship /activity with Lunelli Group. In the latter case, you have the right to object at any time to the processing of your data for such purpose and you will no longer receive such communications.

INTRODUCTION
Pursuant to Regulation (EU) 2016/679 ("GDPR"), this page describes how personal data are processed. This information notice is provided pursuant to art. 13 GDPR.
Processable personal data
Personal Data: any information relating to an identified or identifiable natural person (“**data subject”**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (Recital 26, 27, 30 GDPR).

1. DATA CONTROLLER AND CONTACT DETAILS
Data Controller is **FERRARI F.LLI LUNELLI S.P.A.**, VAT No. 00123890220, with legal headquarter in 38123 Trento (TN), Italy – Via del Ponte no. 15, in person of its legal representative, e-mail ***privacy@gruppolunelli.it*****.**

2. PRIVACY RELATIONSHIP BETWEEN THE DATA CONTROLLER AND BRANDS BELONGING TO THE LUNELLI GROUP.
For the purposes indicated below, Ferrari F.lli Lunelli S.p.a. has appointed the following companies, belonging to the Lunelli Group, as Data Processors:

- **TENUTE LUNELLI SOC. AGR. SRL**
- **SURGIVA F.LLI LUNELLI SPA**
- **BISOL DESIDERIO & FIGLI SRL**
- **CEDRAL TASSONI S.P.A SALÒ**

Data processor is the subject that processes personal data on behalf of the controller (art. 28 GDPR).

3. DATA PROTECTION OFFICER (DPO) AND CONTACT DETAILS
The Data Controller has appointed a **DATA PROTECTION OFFICER (DPO)** pursuant to articles 37 – 39 GDPR. You can contact the DPO by sending an email to ***dpo@gruppolunelli.it*** or at Data Controller’s legal headquarter indicated above.

4. PURPOSES OF THE PROCESSING | LEGAL BASIS OF THE PROCESSING | DATA RETENTION | NATURE OF PROVISION OF PERSONAL DATA

Your personal data will be processed also for the following purposes and will be entered in our CRM:

PURPOSES OF THE PROCESSING	**LEGAL BASIS OF THE PROCESSING**	**DATA RETENTION**	**NATURE OF PROVISION OF PERSONAL DATA**
A) CONTACTS AND COMMUNICATIONS CONCERNING INSTITUTIONAL NEWS, UPDATES ON LUNELLI GROUP, INVITATIONS TO EVENTS, PRESENTATIONS, PRESS CONFERENCES, SENDING OF GIFTS to keep you updated on Lunelli Group's news and strengthen the relationship with you. ***You have the right to object at any time with reference to the abovementioned communications.***	Data processing is necessary for pursuing the **legitimate interest** of the data controller to send these communications in other to strengthen the relationship with you, having regard to your reasonable expectations related to your relationship with the data controller on the basis of your role/activity **(Art. 6 par. 1 lett. F and Recital no. 47 GDPR)**	**Until objection** **You can also exercise, at any time, the right to the erasure of your personal data**	The provision of data is **necessary to send you such communications.** You have the right to object at any time to the processing of your data for the indicated purpose and you will no longer receive such communications. The subsequent objection to these communications will not affect any contractual relationship with the Data Controller nor the other purposes.
B) SOFT SPAM: until objection, commercial / promotional information activities by e-mail to the e-mail address provided for the contract, concerning the same type of product and / or service similar to the product / service object of the sale - Article 130, paragraph 4 of Legislative Decree 196/03 / legitimate interests (art. 6, par. 1 lett. f GDPR).	Data processing is necessary for pursuing the **legitimate interests** of the data controller to send commercial / promotional communications to the e-mail address provided for the contract, concerning the same type of product and / or service similar to the product / service object of the sale (Soft spam), provided that the interests or the fundamental rights and freedoms of the data subject which require the protection of personal data do not prevail, having regard to the reasonable expectations of the data subject based on his/her relationship with the data controller **(Art. 6, par. 1 lett. f and Recital no. 47 GDPR)**.	**Until objection**	Personal data provision is necessary for the sale and to send you communications of the so-called "soft spam". **You have the right to object at any time to the processing of your data for the indicated purpose and you will no longer receive such communications**. The subsequent objection to these e-mail communications will not affect the contract nor the other purposes.

C) DIRECT MARKETING: for direct marketing, market research, surveys on satisfaction degree, newsletters and promotional, commercial and advertising material or regarding events and initiatives, through automated means (E-Mail, telefax, SMS, instant messaging, chat, chatbot, video messages, direct messaging on social networks or other types), as well as traditional means (operator-phone calls, paper mail). **Our communications may include promotional information and/or logos of Lunelli Group brands (FERRARI TRENTO, ENOTECA LUNELLI, TENUTE LUNELLI, SURGIVA, SEGNANA, BISOL 1542, TASSONI, LOCANDA MARGON, GRUPPO LUNELLI). In this case there is no transfer of data.** **For any information on the companies of Lunelli Group please write to *privacy@gruppolunelli.it*.** **Your personal data will be entered in our CRM.** In order to compare and possibly improve the results of communications, the Data Controller could use systems for sending newsletters and promotional communications with reports. Thanks to the reports, the Data Controller will be able to know, for example, the number of readers, openings, unique "clickers" and clicks; the devices and operating systems used to read the communication; details on the activity of individual users; the details of the emails sent, emails delivered, and those forwarded. All these data are used for the purpose of comparing, and possibly improving, the results of communications.	**Consent** **(art. 6 par. 1 lett. a) GDPR)** This consent is autonomous and separate from the consent you can provide (and freely manage and withdraw) in our e-commerce "Enoteca Lunelli" for direct sale of Lunelli Group products. For more information click **here**.	**Until consent's withdrawal (opt-out)**	Personal data provision is **optional**. The non-provision of personal data may result the impossibility to process your data for the present purpose, without prejudice for the other purposes. Direct marketing communications by telephone and paper mail will be sent in compliance with the Italian Public opt-out registry ("RPO - Registro pubblico delle opposizioni") regulations.

D) PROFILING: to create customer profiles and analyse your habits, behaviour and choices in order to improve Data Controller's commercial offer and services.	**Consent (art. 6 par. 1 lett. a) GDPR)**	**36 months, unless the consent's withdrawal (opt-out). Except for the consent's renewal, personal data will be anonymized.**	Personal data provision is **optional**. The non-provision of personal data may result the impossibility to process your data for the present purpose, without prejudice for the other purposes.

5. RECIPIENTS OR CATEGORIES OF RECIPIENTS

Your personal data will be communicated to subjects who will process the data as data Controller or Data Processor (art. 28 GDPR) and/or as individuals acting under the authority of the Data Controller and/or Data Processor (art. 29 GDPR), for the purposes listed above. In particular, the data may be communicated to recipients based in **Italy**, belonging to the following categories:

- Subjects that provide services for the management of the information system and communication networks, including e-mail, hosting and management of the website, newsletters, etc.;
- Subjects that provide services for the management of direct marketing activities;
- Freelancers, studies or companies within assistance and consulting relationships;
- Subjects that provide services for the management of abovementioned purposes (subjects for communication, press agencies, websites, etc.);
- Data Controller's business partners, subjects belonging to the distribution network and service and logistics companies;
- Competent authorities for the fulfilment of legal obligations and/or provisions of public bodies, upon request;
- Companies belonging to Lunelli Group.

In addition, your data will be processed by CRM provider (Salesforce) and database marketing provider (Microsoft Azure), both within and outside the European Economic Area (EEA). In relation to the transfer of personal data outside EEA, see paragraph 6 below.

The list of Data Processors is constantly updated and available by writing to ***privacy@gruppolunelli.it*** or at the registered office of the Data Controller.

6. DATA TRANSFER TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANIZATION

Personal data provided and managed through CRM for the purposes indicated above (purposes A-D) will be transferred abroad to countries outside the EEA pursuant to artt. 44 seq. of GDPR. In particular Data Controller's processors have provided appropriate safeguards, such as participating in the EU-U.S. Data Privacy Framework (DPF), reliable mechanisms for personal data transfers to the United States from the European Union / European Economic Area (art. 45 GDPR). Data Processors also have implemented Binding Corporate Rules (art. 46, par. 2, lett. b and art. 47 GDPR - BCR Binding Corporate Rules, dedicated mechanism for groups of enterprises) and Standard Contractual Clauses (SCC) adopted by European Commission (art. 46, par. 2, lett. c and lett. d of the GDPR). For more information click here, here and here.
You may obtain a copy of the conditions underlying the transfer by contacting the Controller at ***privacy@gruppolunelli.it.***

7. EXISTENCE OF AUTOMATED PROCESS

Personal data will be processed by paper-based, manual, electronic and automated means. In particular, with your consent, personal data will be processed with automated means – through a system of alignment - in order to improve Data Controller's commercial offer and services. The Data Controller will create your customer profile and analyse your habits, behaviour and choices to make proposals and offers of your interest (profiling). For more information, please contact the Data Controller at the e-mail address ***privacy@gruppolunelli.it.***

8. DATA SUBJECT'S RIGHTS

You may exercise your rights as expressed in articles 15 et seq. of the GDPR by contacting the Data Controller at the e-mail address ***privacy@gruppolunelli.it*** or at the other contacts listed above or by contacting the DPO at the e-mail address ***dpo@gruppolunelli.it.*** You have the right, at any time, to request the data Controller to access (art. 15), rectify (art. 16), cancel your personal data (art. 17) or limit their processing (art. 18). The controller shall communicate (art. 19) any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed. The controller shall inform the data subject about those recipients if the data subject requests it. In the cases provided for, you have the right to the portability of your data (art. 20) and in this case the Data Controller will provide you with a structured, commonly used, and readable form of your personal data electronically. In addition, you have the right to object (art. 21), at any time, to the processing of your data on the basis of the legitimate interest. When data processing relies on legitimate interest, information on the relative balancing test is available upon request. You have also the right to withdraw your consent without affecting the lawfulness of the processing based on the consent before withdrawal.

To stop receiving automated direct marketing communications (E-Mail, telefax, SMS, instant messaging, chat, chatbot, video messages, direct messaging on social networks or other types) you can send an e-mail at any time to ***privacy@gruppolunelli.it*** with the subject "no automated marketing" or use our automatic cancellation systems provided for e-mails only.

To stop receiving traditional direct marketing communications (operator-phone calls, paper ***mail***) you can send an e-mail at any time to ***privacy@gruppolunelli.it*** with the subject "no traditional marketing".

To stop receiving any direct marketing communication you can send an e-mail at any time to ***privacy@gruppolunelli.it*** with the subject "*no marketing*".

Furthermore, you can withdraw the consent to profiling by sending an email at any time to ***privacy@gruppolunelli.it*** with the subject "no profiling".

For further details, please refer to the specific information notice in specific form/area of the website.

Without prejudice to any other administrative and judicial remedy. if you believe that the processing of data concerning you violates the provisions of the GDPR, you have the right to lodge a complaint with the Italian Data Protection Authority (https://www.garanteprivacy.it/web/guest/home_en).

9. CHANGES OF THE PRIVACY POLICY

The Data Controller reserves the right to modify, update, add or remove portions of the current Privacy Policy at his discretion and at any time. For this reason, this privacy policy contains an indication of the last update.

Last update: January, 2026