

**INFORMATION STATEMENT OF THE WEBSITE  
FEBALCASA.COM**  
pursuant to Articles 13 and 14 of the Italian Law 171/2018 and EU Regulation  
2016/679 - GDPR

**FOREWORD**

**What is this document?** This document is the personal data processing information statement for the website [www.febalcasa.com](http://www.febalcasa.com)  
**Who is this document intended for?** The information statement is intended for all visitors and customers who interact with the website.  
**Why has this document been prepared?** The Italian Law 171/2018 and EU Regulation 2016/679, under articles 13 and 14, require that you - the Data Subject - are informed of processed personal data and of who processes said data, to guarantee lawful and transparent processing.

Therefore here below you will find a clear list of:

- **who** will process your data
- **what** personal data will be processed
- **the purposes** of the processing of your personal data
- for **how long** data will be processed
- what **rights you have**

**What laws does this document refer to?** The information statement is provided based on the combined provisions of:

- Italian Law 171/2018 regarding the protection of natural persons with reference to the processing of personal data (hereinafter "Law")
- Italian Law 70/1995 which regulates the computerised collection of personal data
- European Regulation for the Protection of Personal Data (GDPR) EU 2016/679 (hereinafter "Regulation")
- Italian Legislative Decree 196/2003 (Privacy Code), as amended by Italian Legislative Decree 101/2018
- European Directive 2002/58/EC so-called "e-Privacy"

**INFORMATION STATEMENT**

**1) PURPOSES, LEGAL BASIS, NATURE OF PROCESSING AND STORAGE PERIOD**

Your personal data are processed for the following purposes:

- a. Registering in the "Myfebal" reserved area:
  - the legal basis for this processing is the need to execute a contract with the Data Subject, or to carry out pre-contractual measures adopted upon the Data Subject's request;
  - the storage period of data processed for this purpose is the same as the duration of the contract and of any legal dispute which may arise, until expiry of the enforceability of any redress actions;
  - the provision of personal data is optional, however refusal to do so will mean requests for reserved area registration will be rejected.
- b. Downloading the Febal Casa catalogue of products:
  - the legal basis for this processing is the pursuit of the Data Controller's legitimate interest in enabling Data Subjects to download the catalogue of products and to analyse the provenance of requests, in aggregate form;
  - the storage period of data processed for this purpose is the same amount of time necessary to process the request;
  - the provision of personal data is optional, however refusal to do so will mean that your request to download the catalogue of products will be rejected.
- c. Responding to contact requests (e.g. requests for information or requests for an appointment in-store):
  - The legal basis for this processing is the pursuit of the legitimate interest of the Data Controller or their sales network in responding to requests from Data Subjects;
  - the storage period of data processed for this purpose is the same amount of time necessary to process the request;
  - the provision of personal data is optional, however refusal to do so will mean contact requests will be rejected.
- d. Finding a Febal Casa store by providing your position:
  - The legal basis for this processing is consent expressed by the data subject to geolocalisation;
  - the storage period of data processed for this purpose depends on the type of cookies activated; More information can be found in the dedicated cookie information statement, available at the following link [www.febalcasa.com/cookie](http://www.febalcasa.com/cookie). You are reminded that consent can be withdrawn at any time, without undermining the lawfulness of processing prior to said withdrawal.
  - the provision of personal data is optional, however refusal to do so will prevent geolocalisation, thus requiring you to search for the closest store manually.
- e. Sending of information and promotion material (direct marketing), also by e-mail and SMS, by the Data Controller or their sales network (newsletter, offers, etc.):
  - The legal basis for this processing is consent expressed by the data subject;
  - the storage period of data processed for this purpose is until the data subject's request to unsubscribe from the newsletter/promotion communication service and in any case no longer than 3 years after the subscription date, after which a request to renew consent will be sent. You are reminded that consent can be withdrawn at any time, without undermining the lawfulness of processing prior to said withdrawal.
- f. Analysing the habits and consumer choices (profiling), carrying out market researches (Customer satisfaction survey and analysis) by the Data Controller:
  - The legal basis for this processing is consent expressed by the data subject;
  - the storage period of data processed for this purpose is until the data subject withdraws consent and in any case no longer than 3 years after the subscription date, after which a request to renew consent will be sent. You are reminded that consent can be withdrawn at any time, without undermining the lawfulness of processing prior to said withdrawal.
  - Further information on logics applied and on the protection of the Data Subject is available, please send a written request to the Data Controller.
- g. Preventing or controlling misconduct or protecting or asserting rights:
  - the legal basis for this processing is the pursuit of the Data Controller's legitimate interest in preventing or prosecuting offences or breaches of intellectual/ industrial property rights (also by third parties) or cyber crimes, or crimes committed on electronic networks;
  - the storage period of data processed for this purpose is the length of time reasonably necessary to assert the Data Controller's rights, from the moment in which they come into the knowledge of the offence or its potential occurrence.

## 2) PERSONAL DATA SUBJECTED TO PROCESSING

By the processing of personal data we mean any operation or combination of operations carried out with or without the use of automated processes and applied to personal data or groups of personal data, such as the collection, organisation, structuring, storage, adaptation, amendment, extraction, consultation, use, communication by means of transmission, disclosure or any other form of availability, comparison or interconnection, deletion or cancellation.

The data subject may submit data to the Data Controller (e.g. contact form in the field "your message") which are definable as "special categories of personal data" pursuant to art. 8 of the Law and art. 9 of the Regulation. Such data discloses the racial or ethnic origin, political opinions, religious or philosophical convictions or trade union affiliation, or includes data regarding the health, sex life or sexual orientation of the person. Said data category will be processed by the Data Controller and their sales network, in order to proceed with responding to the received request. Further types of processing of special categories by the Data Controller will only be carried out upon reception of prior and explicit consent.

The following personal data will be processed:

- *Data requested to register in the "Myfebal" personal area*  
During registration, the Data Controller processes the following personal data: name, surname, e-mail, telephone number and optionally: address, post code and city.
- *Data requested to book an in-store appointment*  
Upon submitting a request, the Data Controller processes the following personal data: name, surname, e-mail, telephone number and optionally: further information of interest linked to products.
- *Data requested to download the catalogue of products*  
Upon submitting a request, the Data Controller processes the following personal data: name, surname, e-mail, province.
- *Browsing data*  
The IT systems and software procedures that enable operation of this website acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols.  
This data category includes IP addresses or domain names of computers and terminals used by users, the URIs/URLs (Uniform Resource identifiers/Locators) of requested resources, request times, the method used to submit requests to the server, the size of the file obtained in response, the numerical code specifying the status of the response provided by the server (successful, error, etc.) and other parameters pertaining to the operative system and the user's computerised environment.  
Said data, necessary for the use of web services, are also treated for the purpose of:
  - obtaining statistical information on the use of services (most frequently visited pages, number of visitors according to time, day, geographical areas of provenance, etc.);
  - controlling the correct operation of services provided.
 Navigation data do not persist for more than 365 days and are deleted immediately after aggregation (unless Judicial Authorities wish to ascertain the commission of offences).
- *Data disclosed by the user*  
The optional, explicit and voluntary sending of messages to the contact addresses of the Data Controller or their sales network results in the acquisition of the sender's contact details which are necessary in order to reply, along with all personal data contained in correspondence.  
The user has the faculty to register on the portal to use services provided by the Data Controller in the reserved area.
- *Cookies and other tracking systems (e.g. find a store with geolocalisation)*  
Please read the detailed information statement available at the following link: [www.febalcasa.com/cookie](http://www.febalcasa.com/cookie)

## 3) RECIPIENTS OF PERSONAL DATA

Your personal data may be shared for the aforementioned reasons with:

- persons or entities which typically act in their capacity as "Data Processors", pursuant to art. 29 of the Law and art. 28 of the Regulation, namely people, companies or professionals who provide assistance and consultancy services for the Data Controller for accounting, administrative, legal, fiscal, financial and credit recovering purposes, etc., pertaining to the provision of services/ products;
- persons or entities with whom interaction is necessary for the provision of services/ products (e.g. own sales network);
- persons, entities or Authorities to whom disclosure of personal data is required by statutory provisions in force or by the orders of Authorities;
- staff explicitly authorised by the Data Controller, pursuant to art. 30 of the Law or art. 29 of the Regulation, necessary for the pursuit of activities strictly correlated with the provision of services/products, who are strictly required to maintain confidentiality or who are suitably bound by a legal confidentiality obligation and who have received suitable operative instructions;

The full list of Data Processors is available, send a written request to the Data Controller to receive it.

## 4) TRANSFER OF PERSONAL DATA

Some of your personal data are shared with recipients which may be based beyond the Republic of San Marino and the European Union. The Data Controller ensures that said recipients process your personal data in compliance with the Law and the Regulation. Transfers may also be made on the basis of adequacy decisions or Standard Contractual Clauses approved by the European Commission. The Data Controller can provide further information.

## 5) EXISTENCE OF AN AUTOMATED DECISION-MAKING PROCESS, INCLUDING PROFILING

With the Data Subject's explicit consent, the Data Controller will not adopt an automated decision-making process for the processing of personal data, including profiling, as per article 22 of the Law and Regulation. The Data Controller can provide further information.

## 6) RIGHTS OF DATA SUBJECTS

Under circumstances provided for, Data Subjects have the right to obtain the following from the Data Controller: access to personal data, the rectification or erasure thereof or the restriction of processing regarding them, or object to processing (articles 15 et seq. of the Law and the Regulation). Any applications made to this effect must be sent to the Data Controller using the special email provided for correspondence with data subjects.

## 7) THE RIGHT TO LODGE COMPLAINTS

Data subjects who believe personal data regarding them has been processed in breach of provisions set forth by the Law and the Regulation have the right to lodge a complaint:

- if in the Republic of San Marino, to the Personal Data Protection Authority ([www.garantepriacy.sm](http://www.garantepriacy.sm)), as provided for by articles 66 of the Law, or by means of suitable legal proceedings (art. 70 of the Law);
- if in the European Union, to the Italian Personal Data Protection Authority ([www.gdpr.it](http://www.gdpr.it)), as provided for by art. 77 of the Regulation, or by means of suitable legal proceedings (art. 79 of the Regulation);

## 8) DATA CONTROLLER

The following companies have signed an internal joint data controller agreement, as provided for by art. 28 of the Law and art. 26 of the Regulation, determining their respective responsibilities regarding compliance with obligations defined by legislation in force, with particular reference to the exercising of the data subject's rights. Upon request from the data subject, the essential contents of the joint data controller agreement will be made available. The data controllers are the following companies:

- Colombini Group S.p.a. with registered office in strada Cà Valentino, 124 – 47891 Falciano (RSM)
- Colombini S.p.a. with registered office in strada Cà Valentino, 124 – 47891 Falciano (RSM)
- Rossana S.r.l. with registered office in strada Cà Valentino, 124 – 47891 Falciano (RSM)
- Uniretail S.r.l. with registered office in via Ausa 191 – 47853 Coriano (ITA)

Sole contact channel for replying to Data Subjects: [privacy@colombinigroup.com](mailto:privacy@colombinigroup.com) - Colombini Group S.p.a. strada Cà Valentino, 124 – 47891 Falciano (RSM)

## 9) PROCEDURE FOR EXERCISING RIGHTS

In order to exercise the aforementioned rights you can access the Privacy section of the website [www.febalcasa.com](http://www.febalcasa.com) and use the special form provided; alternatively you can contact the reference person for data subject enquiries:

- Joint Data Controllers  
Office for the exercising of personal data protection rights based at Colombini Group S.p.A., with registered office in strada Cà Valentino, 124 – 47891 Falciano (RSM), email [privacy@colombinigroup.com](mailto:privacy@colombinigroup.com)
- Data Protection Officer (DPO):  
Data Protection Officer (DPO) Office based at Colombini Group S.p.A., with registered office in strada Cà Valentino, 124 – 47891 Falciano (RSM), email [privacy@colombinigroup.com](mailto:privacy@colombinigroup.com)
- Representative of the European Union and San Marino Joint Data Controllers:  
The exercise of rights towards Colombini Group S.p.A. c/o PRIVACY365 ITALIA S.r.l. with registered office in viale Berna 9/B – 47924 Rimini (RN) - [rappresentante.privacy@privacy365.it](mailto:rappresentante.privacy@privacy365.it) - Certified email address: [privacy365italia@pec.it](mailto:privacy365italia@pec.it)

## 10) AMENDMENTS

The Data Controller reserves the right to amend and/or integrate this Information Statement at any time and undertakes to publish amendments on the website [www.febalcasa.com](http://www.febalcasa.com) under the Privacy section and/or to inform Customers using the methods deemed most suitable.