

## PRIVACY POLICY

Welcome to our website <http://centrostyle.com/>

Centro Style S.p.A. recognizes the importance of maintaining the confidentiality, integrity, and availability of personal data. For this reason, we invite you to read this Privacy Policy carefully. It applies when you access the website and browse within it, as well as when you use the services offered.

This Privacy Policy describes how we process users' personal data collected through the website and is provided to those who interact with the services accessible online via the website, pursuant to Article 13 of EU Regulation 2016/679 and Legislative Decree 196/2003 as amended.

Please note that this Privacy Policy applies only to this website and not to other websites that may be accessed by the user via links, which are to be considered external resources outside the Company's domain

### 1. DATA CONTROLLER CONTACT DETAILS

**Data Controller Contact Details:** Centro Style S.p.A., registered office in Via G.D. Martinengo, 7, CAP 21040, Vedano Olona (VA), Tel. 0332.270.270 and e-mail [infocli@centrostyle.it](mailto:infocli@centrostyle.it)

### 2. TYPES OF DATA PROCESSED

#### **User data collected automatically – Browsing data**

The IT systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified individuals, but, by its very nature, it could allow users to be identified through processing and association with data held by third parties.

This category of data includes IP addresses or domain names of computers and terminals used by users connecting to the site, URI/URL addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.), and other parameters relating to the user's operating system and IT environment.

To ensure the website functions correctly, technical cookies may be collected, whose characteristics are described in the Cookie Policy

#### **Data voluntarily provided by the user**

The Data Controller collects and processes personal data voluntarily and knowingly provided by the user through the website in the sections "Become Our Customer," "Register," and "Subscribe to the Newsletter."

Voluntarily sending messages to the Company's contact addresses, private messages sent by users to Centro Style's social media profiles/pages (where possible), and filling out the forms on the website entail the acquisition of the sender's contact details necessary to reply, as well as any personal data included in the communication.

#### **Redirects to external websites**

The website contains direct links to other sites (e.g., Facebook, Instagram, YouTube, LinkedIn, Whistleblowing Platform). For information on the purposes, type, and methods of collection, processing, use, and storage of personal data by these sites, and on how to exercise your rights, please consult the privacy policy adopted by each respective site.

### 3. PURPOSES AND LEGAL BASES FOR PROCESSING

The website processes personal data of potential customers (opticians) for the following purposes:

- Registration in the "Become Our Customer" area** and qualification as customers: legal basis is the execution of pre-contractual measures or a contract (Art. 6(1)(b) GDPR) and the legitimate interest of the Data Controller (Art. 6(1)(f) GDPR).
- Marketing and commercial purposes:** to carry out promotional and commercial activities and conduct market research and surveys on service quality. These may involve sending emails, SMS, postal mail, or instant messaging services (e.g., WhatsApp). Data may be communicated, including abroad, to third parties providing services instrumental to these purposes. Legal basis: consent (Art. 6(1)(a) GDPR).
- Marketing based on profiling:** to allow the user to receive news and communications based on their indicated preferences and profiling. Legal basis: consent (Art. 6(1)(a) GDPR).
- Newsletter subscription:** to send informational and promotional/commercial content. Legal basis: consent (Art. 6(1)(a) GDPR).

The website also processes personal data of customers (distributors or opticians) to:

- Enable registration in the Reserved Area**, manage the customer relationship and contractual obligations (order management, shipping, returns), activate online payment procedures, and carry out administrative, accounting, and tax activities as required by law. Legal basis: contract performance (Art. 6(1)(b) GDPR).
- Marketing and commercial purposes:** as above. Legal basis: consent (Art. 6(1)(a) GDPR).
- Marketing based on profiling:** as above. Legal basis: consent (Art. 6(1)(a) GDPR).

**CENTRO STYLE S.p.A.** - Via G. D. Martinengo, 7 | 21040 Vedano Olona | VARESE | ITALY

Tel. +39.0332.270.270 | ☎ +39.347.344.53.69 | e-mail: [infocli@centrostyle.it](mailto:infocli@centrostyle.it) | PEC: [centrostyle-pec@certimpresa.it](mailto:centrostyle-pec@certimpresa.it)

C.F. e P.IVA 02018040127 | Codice Destinatario: K1L103O | Cap.Soc. € 1.000.000 | REA Varese 224881

    [CENTROSTYLE.COM](http://CENTROSTYLE.COM)

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- d) **Newsletter subscription:** as above. Legal basis: consent (Art. 6(1)(a) GDPR).

During browsing, by activating cookies and with the user's prior consent (Art. 6(1)(a) GDPR), personal data may be collected for:

- a) Storing user information (e.g., language, location) affecting website behavior and appearance — **preference cookies**;
- b) Tracking visitors to present relevant and engaging advertisements — **marketing cookies**.

#### **NATURE OF DATA PROVISION AND CONSEQUENCES OF REFUSAL**

- **Site registration:** required data marked with \* are necessary; failure to provide them prevents access to the Reserved Area.
- **Become Our Customer:** required data marked with \* are necessary; failure prevents sending the request to the Company.
- **Newsletter subscription:** required data marked with \* are necessary; failure prevents receiving informational and promotional communications.
- **Newsletter with profiling:** required data enable personalized communications; not selecting this option doesn't affect receiving general marketing communications.
- **Promotional activities and surveys:** required data are necessary to participate; refusal has no impact on other services.
- **Cookies requiring consent:** refusal doesn't affect website browsing or service use.
- **Monitoring of access and attacks:** data are essential to ensure website security and manage potential cyberattacks.

#### **4. DATA RETENTION PERIOD**

Data will be processed for the time necessary to fulfill the purposes outlined above:

- User profiles in Reserved Areas remain active until the agreement with the Company ends and in compliance with legal obligations.
- Email addresses collected via the "Subscribe to our Newsletter" form are stored until the user withdraws consent. For profiling-based newsletters, data from the last 12 months are used.
- Data collected for promotional/marketing activities and surveys are stored for 24 months from the last relevant contact.
- Website operation data are stored as needed and as stated in the Cookie Policy.
- Cookie retention duration is specified in the Cookie Policy.

If the user believes the purpose of processing has been fulfilled, they must notify the Company in writing, which will delete the data immediately unless otherwise required by law.

#### **5. SOURCES**

Data may be collected through Centro Style's website or directly from the individuals concerned.

#### **6. DATA DISCLOSURE**

Users' personal data are an important part of our operations and are not sold to others. Data may be shared within the Company with employees and collaborators authorized to process it and with external companies and professionals handling IT system and website management, marketing assistance (including data analysis, research, email/newsletter sending, profiling). These parties act as Data Processors under instructions from the Controller. Data may also be disclosed to regulatory authorities and law enforcement, acting as independent controllers.

#### **7. DATA TRANSFER TO THIRD COUNTRIES**

Processing connected to the website's services takes place in Italy. Data are stored on servers within the EU. Data are not transferred outside the EU. If transfer becomes necessary, the Controller will ensure compliance with applicable laws by using adequate safeguards and/or standard contractual clauses.

#### **8. DATA SUBJECTS' RIGHTS**

Within applicable law, users have the right to access their personal data, request rectification or erasure, object to processing, request restriction of processing, receive data in a structured, commonly used, machine-readable format, and withdraw consent (Articles 15 et seq. GDPR).

Requests will be answered within 30 days, with a possible 30-day extension where legally permitted. If processing violates GDPR or national provisions, users have the right to lodge a complaint with the Data Protection Authority or take legal action.

To exercise these rights, users can contact the Controller at the contact details indicated above.