



Loyalty Program

C&C Fidelity Card

Information on the processing of personal data pursuant to
Regulation (EU) 2016/679 and Legislative Decree 196/2003

The present informations are provided in compliance with the provisions of EU legislation (Regulation (EU) 2016/679 of April 27, 2016, concerning the protection of natural persons regarding the processing of personal data and on the free movement of such data, General Data Protection Regulation, hereinafter, for brevity, "GDPR") and the current national legislation on the matter.

DATA CONTROLLER

The Data Controller is C&C S.p.A., with its registered office at Viale Einaudi n. 10 - Bari (BA), (email: privacy@cec.com, PEC: info@pec.cecconsulting.it, Tel.: 080 5622398).

C&C S.p.A.

Sede legale: viale L. Einaudi, 10 - 70125 Bari - P.IVA: 05685740721 - SDI: M5UXCR1
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PURPOSES, LEGAL BASIS, AND RETENTION PERIOD

Purpose of processing	Legal basis of processing	Retention period
Execution of the contract concerning enrollment in the Loyalty Program and the issuance of the "C&C Fidelity Card."	Performance of a contract regarding enrollment in the Loyalty Program and the issuance of the C&C Fidelity Card.	For the execution of the contract regarding enrollment in the Loyalty Program and the issuance of the "C&C Fidelity Card".
Fulfillment of fiscal and accounting obligations.	Fulfillment of a legal obligation to which the data controller is subject.	The duration of the contractual relationship and, after its termination, for the period required by law.
Direct promotional activities (e.g., sending promotional offers, commercial initiatives dedicated to customers, advertising material via, for example and not limited to, SMS, email, and WhatsApp).	Consent to the processing of personal data for the specific purpose.	Until consent is revoked. If consent is not revoked, data will be retained for a maximum of 24 months from the date consent was given.
Profiling activities for direct marketing purposes (automated analysis and/or prediction of personal preferences and interests, geographical location, and spending capacity).	Consent to the processing of personal data for the specific purpose.	Until consent is revoked. If consent is not revoked, data will be retained for a maximum of 12 months from the date consent was given.

Your personal data will be processed at the headquarters located at Viale Einaudi n.10 - Bari (BA), as well as at operational offices. Processing will be carried out using both automated and manual methods, with procedures and tools designed to ensure maximum security and confidentiality, by expressly authorized personnel for the time strictly necessary to achieve the purposes for which the data was collected. The data provided will be used with paper, IT, and telematic tools.

Specific security measures are observed to prevent data loss, illicit or incorrect use, and unauthorized access. After the aforementioned retention periods expire, the data will be destroyed or anonymized, consistent with technical deletion and backup procedures.

NATURE OF THE PROVISION AND REFUSAL

The provision of personal data is mandatory for the fulfillment of legal obligations and, therefore, any refusal, even partial, or incorrect indication of such data determines the impossibility for the Data Controller to correctly execute the services connected. With reference to the purposes for which consent is required, the provision of personal data is optional. Failure to provide it, however, makes it impossible to pursue the aforementioned purposes.

RECIPIENTS OF THE DATA

The following subjects are recipients of the data collected and, therefore, will process such data on behalf of the Data Controller, pursuant to art. 28 of the Regulation, as Data Processors:

- IT consultants (or consultancy companies) for the provision of services relating to the assistance and maintenance of software and hardware

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- External consultants and collaborators
- E-mail provider and pec providers

Lawyers who provide functional services for the purposes indicated above could also be recipients of the data. To know at any time the subjects to whom your data will be communicated, it is sufficient for you to request an updated list by writing to the Data Controller at the addresses indicated above.

Furthermore, your data may be communicated to external subjects such as, by way of example and not limited to, supervisory and control authorities and bodies and, in general, public or private subjects, entitled to request the data (e.g. Agenzia dell'Entrate - Italian Revenue Agency, Guardia di Finanza - Italian Financial Police).

AUTHORIZED PARTIES

The personal data collected will also be processed by internal authorized parties who act on the basis of specific instructions provided regarding the purposes and methods of the processing itself.

RIGHTS OF INTERESTED PARTIES - COMPLAINT TO THE SUPERVISORY AUTHORITY

In relation to the data subject to the processing referred to in this document, it is your right:

- at any time, to ask the owner for access to your personal data and information relating to them (art. 15 of the GDPR); the rectification of inaccurate data or the integration of incomplete data (art. 16 of the GDPR); the deletion of personal data concerning you (upon the occurrence of one of the conditions indicated in art. 17, par. 1 of the GDPR and in compliance with the exceptions provided for in par. 3 of the same article); the limitation of the processing of your personal data (in the event of one of the hypotheses indicated in art. 18, par. 1 of the GDPR);
- at any time, request and obtain from the owner – in the cases in which the legal basis of the processing is the contract or consent, and the same is carried out by automated means – your personal data in a structured and machine-readable format, also for the purpose of communicating such data to another data controller (so-called right to portability of personal data art. 20 of the GDPR);
- at any time, object to the processing of your personal data in the event of particular situations concerning you (art. 21 of the GDPR).

The appropriate request should be submitted by contacting the Data Controller via PEC at info@pec.cecconsulting.it, at the e-mail address privacy@cec.com or registered letter with return receipt to the address Viale Einaudi, 10 – Bari (BA).

If you believe that the processing of your data violates the GDPR, you can lodge a complaint with a supervisory authority (Authority for the protection of personal data - www.garanteprivacy.it), as provided for in Article 77 of the GDPR, or initiate legal proceedings (Article 79 of the GDPR).