



INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF THE EU REGULATION 679/2016

The Data Controller informs you about the processing of personal data necessary for the management of the contractual relationship. Personal data mainly relates to individual contacts. The clients receiving invoices are exclusively legal entities.

The information also refers to customers who purchase through the e-commerce functionality of the website www.luminalpark.com.

Data Subjects: Customers and contact persons of customer companies.

Data Controller: LUMINAL PARK S.R.L. located in Verona (VR) in Via Goffredo Mameli 11, partita IVA 04199420235, contact email: privacy@luminalpark.com

Data protection officer: pursuant to art. 37 of the GDPR, the Data Controller has appointed a DPO who can be contacted at the email address: dpo@pqa.it.

Purpose of treatment: your data will be processed for the following purposes on the basis of the relevant legal bases

No	Purpose	Legal basis
1	Sales agreement management.	Processing is necessary for the performance of a contract to which the data subject is party. Art. 6 par. 1 comma b)
2	Quotation and offers management.	Implementation of pre-contractual measures taken at the request of the data subject Art. 6 par. 1 comma b)
3	Accounting and tax legislation obligations.	Processing is necessary for compliance with a legal obligation to which the controller is subject; Art. 6 par. 1 comma c)
4	Customer care e after sale services and Customer satisfaction detection	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Art. 6 par. 1 comma f)
5	Litigation management and credit recovery activities	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Art. 6 par. 1 comma f)



6	Sending communications via newsletters to keep you updated about new product developments, promotions, services and/or events organized by us.	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Art. 6(1)(f) GDPR and Art. 130(4) of Italian Legislative Decree 196/2003.
7	Use of tracking pixels or equivalent tools in communications sent via newsletters, in order to detect whether communications are opened, interactions with content, clicks on links or attachments, and to measure the performance of the communications sent.	Processing is carried out on the basis of the data subject's explicit consent, given pursuant to Art. 6(1)(a) GDPR. Consent may be withdrawn at any time, including separately from unsubscribing from the newsletter. Ref. Italian Data Protection Authority Decision No. 284 of 17 April 2026.

Nobody automated decision-making process (profiling) will be applied to your personal data.

Type of personal data processed: for the purposes stated above, it is necessary to process:

- Common identification and contact data;
- Data relating to the economic activities of the data subject;
- Data relating to debt solvency and creditworthiness.
- Data relating to interaction with newsletters and any tracking tools used, such as message opening, date and time of interaction, clicks on links or attachments, IP address and technical information relating to the device used, to the extent necessary and subject to prior consent where required.

Method of treatment

The personal data collected will be processed with:

- corporate IT systems and paper archives, in compliance with the Security Measures provided for by art. 32 of the GDPR;
- personal data will be processed by persons appointed as data authorized pursuant to art. 29 of the GDPR.

Data recipients

Personal data will be disclosed to:

- Banks and credit institutions;
- Providers for electronic payment services;
- Companies that provide digital preservation services in accordance with the law;
- Platforms providing DEM services for sending newsletters and, subject to prior consent, for managing tracking pixels or equivalent tools;
- Public or Private bodies whose communication is necessary for legislative obligations;
- Consultants and freelance professionals, including in an associated form;
- Insurance companies that provide trade credit insurance services;
- Logistic companies and post office.

The above subjects have been expressly appointed as Data Processors pursuant to Art. 28 of the GDPR or as independent data controllers.

Personal data disclosure: personal data will not be disclosed.

Transfers of personal data to third countries: the personal data collected will be processed within European Union or transferred to third countries in compliance with art. 44 of the GDPR.

Data retention period: the retention of your personal data is determined according to the following principles:

Purpose	Data Retention
Retention of accounting and tax records	your data will be kept for 10 years, the time of conservation for fiscal accounting records. Art. 2220 Italian Civil Code.
Sending newsletters	your data will be kept on our mailing lists until you request cancellation using the appropriate function in the mail's body, alternatively you must request cancellation by writing an email to privacy@luminalpark.com
Data derived from tracking pixels in newsletters	Your data will be retained for the time necessary to measure interactions with the communications sent, and in any event until consent to the processing is withdrawn; consent may be withdrawn separately from unsubscribing from the newsletter.

Rights of the data subjects: Pursuant to Articles 15–22 of the GDPR, the data subject may request from the Controller the exercise of the right of access, rectification, erasure (right to be forgotten), restriction of processing, data portability, objection to processing, and withdrawal of consent.

For more information relating to the data subjects' rights, it is possible to consult the website www.garanteprivacy.it

Pursuant to art. 77 of the GDPR, data subject can submit a notify by contacting Italian Data Protection Authority located in Piazza Venezia, 11 - 00186 Rome mail: urp@gdpd.it