

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

The Data Controller informs users and customers about the processing of personal data carried out through the contact form available on Luminal Park's website.

The contact form allows users to submit requests for information, assistance, clarifications, quotations or other communications by completing the relevant fields and, where necessary, attaching documents or other files. Data provided through the form will be used to handle the request and respond through the contact channels considered appropriate in relation to that request.

Where the data subject provides a telephone number or asks to be contacted through that channel, Luminal Park may also contact them via WhatsApp Business exclusively to handle the submitted request. WhatsApp Business will not be used for promotional or marketing purposes without the data subject's separate and specific consent.

**Data Subjects:** website users, customers, prospective customers and individual contacts at customer or prospective customer companies who submit a request using the contact form.

**Data Controller:** LUMINAL PARK S.R.L., with registered office in Verona (VR), Via Goffredo Mameli 11, VAT No. 04199420235, contact email: [privacy@luminalpark.com](mailto:privacy@luminalpark.com)

**Data protection officer:** pursuant to Art. 37 GDPR, the Data Controller has appointed a DPO who can be contacted at the following email address: [dpo@pqa.it](mailto:dpo@pqa.it).

**Purposes of processing:** your data will be processed for the following purposes on the basis of the relevant legal bases:

| No | Purpose                                                                                                                                                                                    | Legal basis                                                                                                                                                                                    |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Receipt, handling and response to requests submitted through the website contact form, including requests for information, assistance, clarifications, quotations or other communications. | Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract and/or for managing the relationship with the customer. Art. 6(1)(b) GDPR. |
| 2  | Processing of any documents, images or other files attached by the user to the contact form, to the extent that they are relevant to the submitted request.                                | Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract and/or for managing the submitted request. Art. 6(1)(b) GDPR.              |
| 3  | Follow-up contact with the user by email, telephone and, where a telephone number is provided or that channel is requested, including via                                                  | Processing is necessary in order to take steps at the request of the data subject prior to entering into a contract and/or                                                                     |

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| WhatsApp Business, exclusively to handle the submitted request. | for managing the support request or the relationship with the customer. Art. 6(1)(b) GDPR. |
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Data will not be used for marketing or profiling solely on the basis of submitting a request through the contact form, without a separate privacy notice and specific consent where required.

### **Types of personal data processed**

For the purposes stated above, it is necessary to process:

- identification and contact data provided by the user, in particular the email address and any other contact details communicated;
- data contained in the subject line and description of the request submitted through the contact form;
- any documents, images or other files attached by the user;
- any additional personal data voluntarily provided by the data subject in the message or attachments, including any telephone number;

The Data Controller does not ask users to disclose data belonging to special categories pursuant to Art. 9 GDPR, such as, by way of example, health data, religious beliefs, political opinions or other sensitive data, unless this is strictly necessary for the specific request.

### **Methods of processing**

The personal data collected will mainly be processed using:

- the contact form and web systems connected to the website;
- corporate IT systems;
- any ticketing, customer support or CRM platforms used to manage the request;
- corporate email systems and communication tools;
- WhatsApp Business, limited to cases in which the data subject has provided a telephone number or requested that method of follow-up for handling the request;
- appropriate technical and organizational security measures pursuant to Art. 32 GDPR.

Personal data will be processed by personnel authorized pursuant to Art. 29 GDPR and by external parties appointed, where necessary, as Data Processors pursuant to Art. 28 GDPR.

### **Data recipients**

Personal data may be disclosed to:

- providers of website hosting, management, maintenance and security services;
- providers of platforms or software for managing requests, tickets or CRM systems;
- providers of corporate email and communication services;
- the WhatsApp Business service provider, where that service is used for follow-up requested by the data subject;
- consultants and professionals who assist the Data Controller in technical, legal, privacy or organizational matters;
- public authorities or parties to whom disclosure is required by law.

The above parties have been or will be expressly appointed as Data Processors pursuant to Art. 28 GDPR where they process personal data on behalf of the Data Controller, or will process the data as independent data controllers in the cases provided for by applicable law.

**Personal data disclosure:** personal data will not be disclosed to the public in any way.

**Transfers of personal data to third countries:** the personal data collected are processed exclusively within the European Union.

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

| Purpose                                                                                                                       | Data Retention                                                                                                                                                                                                                                                                                                                      |
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| <b>Management of requests submitted through the contact form, including the subject line, description and any attachments</b> | The data will be retained for the time necessary to manage the request and, as a rule, for a maximum period of 12 months from closure of the request or the last relevant contact, unless further retention is necessary to comply with legal obligations or protect the Data Controller's rights.                                  |
| <b>Follow-up by email, telephone or WhatsApp Business</b>                                                                     | Contact details and any follow-up communications will be retained for the time necessary to respond and complete the handling of the request, unless the request results in the establishment of a contractual or commercial relationship, in which case the retention periods set out in the applicable privacy notice will apply. |

**Rights of the data subjects:** pursuant to Articles 15-22 GDPR, the data subject may request from the Data Controller the exercise of the rights 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 data subjects' rights, please visit [www.garanteprivacy.it](http://www.garanteprivacy.it).

Pursuant to Art. 77 GDPR, the data subject may submit a report or lodge a complaint with the Italian Data Protection Authority, located at Piazza Venezia 11, 00186 Rome, email: [urp@gpdp.it](mailto:urp@gpdp.it).