

PRIVACY POLICY

Information document pursuant to and for the purposes of Article 13 of EU Regulation 2016/679 (GDPR)



WHY THIS INFORMATION

Pursuant to Regulation (EU) 2016/679 (hereinafter “GDPR”), this page describes the methods of processing personal data. This information notice is provided in accordance with Article 13 of the GDPR. The notice is not considered valid for other third-party websites that may be accessed through links on this website, for which no responsibility is assumed.

Processable Personal Data

Personal data: any information relating to an identified or identifiable natural person (“**data subject**”); a natural person is considered identifiable if they can be identified, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to their physical, physiological, genetic, mental, economic, cultural, or social identity (Articles 26, 27, 30 GDPR).

Data of contractors/users.

Browsing data

The IT systems and software procedures used for the operation of this website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes IP addresses or domain names of the computers and devices used by users, URI/URL addresses (Uniform Resource Identifier/Locator) 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 numeric code indicating the status of the server response (success, error, etc.), and other parameters related to the user’s operating system and IT environment.

Information on the processing of personal data carried out through Social Media platforms

Regarding the processing of personal data by the operators of Social Media platforms used by the Data Controller, reference is made to the information provided by them through their respective privacy policies. The Data Controller processes personal data provided by users through the pages of dedicated Social Media platforms to manage interactions with users (comments, public posts, etc.) and in compliance with applicable regulations.



Cookies and other tracking systems. What are they? What are they used for?





For information on cookies and other tracking systems, please refer to the cookie policy available in the website footer and at the following link.







1. WHO IS THE DATA CONTROLLER? HOW CAN THEY BE CONTACTED?

The Data Controller is Luini Srl, with registered office at Via Santa Radegonda 16, 20121, Milan (MI), represented by its pro tempore Legal Representative, who can be contacted for any information by phone at +39 02 86461917 or by email at privacy@luini.it.

2. PURPOSE OF PROCESSING, LEGAL BASIS, DATA RETENTION PERIOD, AND NATURE OF DATA PROVISION

 PURPOSE OF PROCESSING	 LEGAL BASIS	 DATA RETENTION PERIOD	 NATURE OF DATA PROVISION
Browsing this website. The data necessary for the use of web services is also processed for the purpose of monitoring the correct functioning of the services offered.	The processing is necessary for the pursuit of the legitimate interests of the Data Controller or third parties, provided that such interests do not override the fundamental rights and freedoms of the data subject that require the protection of personal data, taking into account the reasonable expectations of the data subject and the activities strictly necessary for the functioning of the website and for browsing itself (Art. 6(1)(f) and Recital 47 GDPR).	The retention of browsing data will last only for the duration of the browsing session.	Providing the data is necessary for browsing the website.
Use of cookies and equivalent technologies. Please refer to the cookie policy in the website footer.	For non-essential technical cookies and equivalent technologies, the processing is based on the consent to the processing of personal data (Art. 6(1)(a) and Recitals 42, 43 GDPR).	Please refer to the cookie policy in the website footer.	Please refer to the cookie policy in the website footer.

In addition to browsing, personal data will be processed for:

 PURPOSE OF PROCESSING	 LEGAL BASIS	 DATA RETENTION PERIOD	 NATURE OF DATA PROVISION
A) CONTACTS , sending contact requests, information requests	The processing is necessary for the performance of a contract to which the data subject is a party or for the implementation of pre-contractual measures taken at the data subject's request (Recital 44), Art. 6(1)(b) GDPR.	Maximum 12 months	Providing the data is mandatory. Failure to provide the necessary data will make it impossible to be contacted or to receive information.
B) MANAGEMENT OF YOUR REQUESTS and requests from other data subjects, pursuant to Articles 15 et seq. of the GDPR (data subject rights)	The processing is necessary to comply with a legal obligation to which the Data Controller is subject (Recital 45), Art. 6(1)(c) GDPR.	5 years from the closure of the request, unless in case of disputes	Providing personal data is mandatory, as it is essential to comply with legal obligations.



3. WHO WILL PERSONAL DATA BE DISCLOSED TO? RECIPIENTS OF THE DATA

Personal data will be disclosed, also based on the purposes provided in specific areas, to entities that will process the data as independent Data Controllers or as Data Processors (Art. 28 GDPR) and will be handled by natural persons (Art. 29 GDPR) acting under the authority of the Controller and the Processors according to specific instructions provided regarding the purposes and methods of processing, for purposes specific to the relevant area. The data will be disclosed to recipients belonging to the following categories:

- Entities based in Italy that provide services for the website and communication networks, including email;
- Competent authorities for compliance with legal obligations and/or provisions of public bodies, upon request.

The list of Data Processors is available by writing to privacy@luini.it or to the other contacts indicated above.



4. WILL THE DATA BE TRANSFERRED TO NON-EEA COUNTRIES?

Personal data will not be transferred to non-EEA countries.



5. IS THERE AN AUTOMATED PROCESS?

Personal data will be processed manually, electronically, and through automated means.



6. WHAT ARE YOUR RIGHTS? HOW CAN YOU EXERCISE THEM?

You can exercise your rights as provided by Articles 15 et seq. of the GDPR by contacting the Data Controller at the e-mail address privacy@luini.it or via the contact details indicated above. You have the right, at any time, to request access to your personal data (Art. 15), rectification (Art. 16), erasure (Art. 17), and restriction of processing (Art. 18). The Data Controller communicates (Art. 19) any corrections, deletions, or restrictions of processing carried out to each recipient to whom the personal data have been disclosed. The Data Controller will inform the data subject of such recipients upon request.

Where applicable, you have the right to data portability (Art. 20), and in such cases, the data will be provided to you in a structured, commonly used, and machine-readable format. You have the right to object (Art. 21), at any time, to the processing of data based on legitimate interest, and in cases where the legal basis is consent, you have the right to withdraw your consent without affecting the lawfulness of processing based on consent before its withdrawal.

If you believe that the processing of your personal data by the Data Controller violates the provisions of Regulation (EU) 2016/679, you have the right to lodge a complaint with the supervisory authority, particularly in the Member State where you usually reside or work, or where the alleged violation of the regulation occurred (Privacy Authority: <https://www.garanteprivacy.it/>), or to seek judicial remedies.



7. UPDATES TO THE PRIVACY POLICY

The Data Controller reserves the right to modify, update, add, or remove parts of this privacy notice. To facilitate review and tracking of changes, the notice will include the date of the latest update.

Last updated date: 02/12/2025