PRIVACY POLICY
Information notice pursuant to art. 13 Regulation (EU) 2016/679

Welcome to Lunelli Group, ambassador of the Italian Art of Living around the world.

The following applies to pages, domains and sub-domains registered for each of the brands and / or companies belonging to the Lunelli Group, viz. **FERRARI TRENTO**, **TENUTE LUNELLI**, **SURGIVA**, **SEGNANA**, **BISOL 1542**, **TASSONI**, **LOCANDA MARGON** and **GRUPPO LUNELLI**, brands and / or companies that the Lunelli family has chosen to complement **FERRARI TRENTO** (for more information please visit https://www.ferraritrento.com/en/lunelli-group/).
For this reason, in accordance with current privacy legislation, the data controllership belongs to Ferrari Trento (Ferrari F.lli Lunelli Spa), which determines the purposes and means of the processing of personal data in relation to these websites /pages. Therefore, Ferrari Trento may send you - previous your consent in accordance with this policy - communications related to the brands of Lunelli Group. If you have provided Ferrari Trento with this consent, you will have the opportunity to be informed only in relation to the brands for which you expressed interest. Ferrari Trento will also give you this option for profiling, which relies on a specific and separate consent. For any information you may need, please contact us through the contact datails indicated in this policy.



INTRODUCTION
Pursuant to Regulation (EU) 2016/679 ("GDPR"), this page describes how personal data are processed. This information notice is provided pursuant to art. 13 GDPR.
Processable personal data
Personal Data: any information relating to an identified or identifiable natural person (“**data subject”**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (Recital 26, 27, 30 GDPR).
Navigation data
Computer systems and software procedures used to the operation of this website acquire, during their normal operation, some personal data whose transmission is implicit in the internet communication protocols. This information is not collected to be associated with identified data subject, but by their nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of computers used by users who connect to the site, URI (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters regarding the operating system and computer environment.
Personal data provided by data subjects
The optional, explicit and voluntary sending of messages to the contact addresses indicated on this site and/or the filling in data collection forms results in the acquisition of the sender’s address, necessary to reply to requests, as well as any other personal data provided. For booking visits/services/experiences and participation in events of Lunelli Group companies, the data subject may optionally provide data belonging to **special categories of personal data** (Art. 9 GDPR), in particular data revealing racial or ethnic origin, religious or philosophical beliefs, data concerning health (intolerances, allergies, diseases or behavioral food habits, for on-site management of tastings, menu, etc.).
Information on the processing of personal data by way of the social media platforms
As for the processing of personal data that is carried out by the social media platforms used by the Data Controller, please consider the information provided by those platforms through their privacy policies. The Data Controller processes the personal data provided by users through the social media pages in order to handle user interactions (comments, public posts, etc) in full compliance with the applicable legislation.
Specific information notices
Specific information notices will be present on the pages of the Site in relation to particular services or processing of personal data provided.



COOKIES
Cookies are small text files containing information generated by a web site's server and placed on a user's-visitor’s personal computer, where they are stored and then retransmitted to during the next visit. "Third parties" cookies are instead set by a website other than the one the user is visiting. This happens because on each site there may be elements (images, maps, sounds, specific links to web pages of other domains, etc.) that reside on different

hosting-servers. Cookies are employed for different purposes: execution of computer authentication, sessions' monitoring, storage of information relating to specific configurations from users accessing the platform, preferences' storage, etc. For more information relating to cookies and their general functions, see our cookie policy at this link.



1. DATA CONTROLLER AND CONTACT DETAILS

Data Controller is **FERRARI F.LLI LUNELLI S.P.A.**, VAT No. 00123890220, with legal headquarter in 38123 Trento (TN), Italy – Via del Ponte no. 15, in person of its legal representative, e-mail ***privacy@gruppolunelli.it*.**

2. PRIVACY RELATIONSHIP BETWEEN THE DATA CONTROLLER AND BRANDS BELONGING TO THE LUNELLI GROUP.

For the purposes indicated below, Ferrari F.lli Lunelli S.p.a. has appointed the following companies, belonging to the Lunelli Group, as Data Processors:

- **TENUTE LUNELLI SOC. AGR. SRL**;
- **SURGIVA F.LLI LUNELLI SPA**;
- **BISOL DESIDERIO & FIGLI SRL**;
- **CEDRAL TASSONI S.P.A SALÒ**;

Data processor is the subject that processes personal data on behalf of the controller (art. 28 GDPR).



3. DATA PROTECTION OFFICER (DPO) AND CONTACT DETAILS

The Data Controller has appointed a **DATA PROTECTION OFFICER (DPO)** pursuant to articles 37 – 39 GDPR. You can contact the DPO by sending an email to ***dpo@gruppolunelli.it*** or at Data Controller's legal headquarter indicated above.

4. PURPOSES OF THE PROCESSING | LEGAL BASIS OF THE PROCESSING | DATA RETENTION | NATURE OF PROVISION OF PERSONAL DATA

Browsing the website

 **PURPOSES OF THE PROCESSING**	 **LEGAL BASIS OF THE PROCESSING**	 **DATA RETENTION**	 **NATURE OF PROVISION OF PERSONAL DATA**
WEBSITE BROWSING. The broswing data will be processed also for the following purposes: • statistical information on the use of the services (most visited pages, number of visitors and time range, origin, etc.); •check of the correct functioning of the services.	Data processing is necessary for the purposes of pursuing the **legitimate interests** of the data controller or a third party, provided that the interests or the fundamental rights and freedoms of the data subject which require the protection of personal data do not prevail, having	Until the duration of the browsing session. See paragraph on cookies.	The provision of data data is necessary for the broswing on this website.

The data will be used to foreseek liabilities in case of computer criminal offences against this site.	regard to the reasonable expectations of the data subject based on his/her relationship with the data controller. Activities strictly necessary for the operation of the site and the provision of the navigation services. **(Art. 6, par. 1 lett. F and Recital 47 of the GDPR)**		
Use of **cookies** and comparable technologies. See the cookies policy in the footer of the site	For marketing and profiling cookies, the processing is relied on **consent (art. 6 par. 1 lett. A and Recital 42, 43 of the GDPR)**. Consent is expressed through the banner and the cookie policy of this website	See the cookie policy in the footer of the site	See the cookie policy in the footer of the site

Your personal data will be processed also for the following purposes and will be entered in our CRM:

 **PURPOSES OF THE PROCESSING**	 **LEGAL BASIS OF THE PROCESSING**	 **DATA RETENTION**	 **NATURE OF PROVISION OF PERSONAL DATA**
A) CONTACTS AND REQUESTS, REGISTRATION / BOOKING AND RELATED COMMINICATIONS: our feedbacks will be forwarded to the contacts you proivided to us or to the ones collected through the forms on the present website. *For further details, please refer to the specific form/area of the website.*	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract **(art. 6 par. 1 lett. b) GDPR)**	Upon submission of your request, personal data will be stored for 10 years for accounting purposes. After such period, personal data will be anonymized accordingly. When the registration process is not completed, personal dato will be delated after 1 month accordingly.	The provision of data is **necessary**. The non provision of personal data may result the impossibility to process your data for the present purpose, without prejudice for the other purposes.
Futhermore, the Data Controller may collect personal data in order to manage specific needs related to eventual requests you may submit. Such data may included for instance health data (intolerances, allergies, diseases or behavioral food habits) for management of food and beverage during events, tastings, menu, etc..	Health data processing is relied on **consent (art. 6 par. 1 lett. a) GDPR)**	**14 days after the experience, unless the consent's withdrawal (opt-out). After this period, personal data will be delated.**	Personal data provision is **optional**. The non-provision of personal data may result the impossibility to custom your experience according to your specific needs. Please note that you can commmunicate to us, at any time, intolerances, allergies, behavioral food habits, etc. before starting the experience: our staff is at your disposal for any clafication you may need pursuant to the legislative provisions in force from time to time.
B) SOFT SPAM: <u>until objection</u>, commercial / promotional information activities by e-mail to the e-mail address provided for the contract, concerning the same type of product and / or service similar to the product / service object of	Data processing is necessary for pursuing the **legitimate interests** of the data controller to send commercial / promotional communications to the e-mail address provided for the contract,	**Until objection**	Personal data provision is necessary for the sale and to send you communications of the so-called "soft spam". **You have the right to object at any time to the**

the sale - Article 130, paragraph 4 of Legislative Decree 196/03 / legitimate interests (art. 6, par. 1 lett. f GDPR).	concerning the same type of product and / or service similar to the product / service object of the sale (Soft spam), provided that the interests or the fundamental rights and freedoms of the data subject which require the protection of personal data do not prevail, having regard to the reasonable expectations of the data subject based on his/her relationship with the data controller **(Art. 6, par. 1 lett. f and Recital no. 47 GDPR)**.		**processing of your data for the indicated purpose and you will no longer receive such communications**. The subsequent objection to these e-mail communications will not affect the contract nor the other purposes.
C) DIRECT MARKETING: for direct marketing, market research, surveys on satisfaction degree, newsletters and promotionals, commercial and advertising material or regarding events and initiatives, through automated means (E-Mail, telefax, SMS, instant messaging, chat, chatbot, video messages, direct messaging on social networks or other types), as well as traditional means (operator-phone calls, paper mail). **Our communications may include promotional information and/or logos of Lunelli Group brands (FERRARI TRENTO, ENOTECA LUNELLI, TENUTE LUNELLI, SURGIVA, SEGNANA, BISOL 1542, TASSONI, LOCANDA MARGON, GRUPPO LUNELLI). In this case there is no transfer of data.** **For any information on the companies of Lunelli Group please write to *privacy@gruppolunelli.it*.**	**Consent** **(art. 6 par. 1 lett. a) GDPR)** This consent is separate from the consent you can provide (and freely manage and withdraw) in our e-commerce "Enoteca Lunelli" for direct sale of Lunelli Group products. For more information click **here**.	**Until consent's withdrawal (opt-out)**	Personal data provision is **optional**. The non-provision of personal data may result the impossibility to process your data for the present purpose, without prejudice for the other purposes. Direct marketing communications by telephone and paper mail will be sent in compliance with the Italian Public opt-out registry ("RPO - Registro pubblico delle opposizioni") regulations.

D) PROFILING: to create customer profiles and analyse your habits, behaviour and choices in order to improve Data Controller's commercial offer and services.	**Consent (art. 6 par. 1 lett. a) GDPR)**	**36 months, unless the consent's withdrawal (opt-out). Except for the consent's renewal, personal data will be anonymized.**	Personal data provision is **optional**. The non-provision of personal data may result the impossibility to process your data for the present purpose, without prejudice for the other purposes.
E) APPLICATION TO PERSONNEL SELECTION IN THE "WORK WITH US" AREA: research and selection of personnel with a view to the possible establishment of a working relationship, also for any positions other than those for which the data subject has spontaneously applied; conservation of personal data also for future selections; management of applications in response to job offers published on our website; interviews and any video interviews (data processing including image/audio). For details, see the information notice in the specific area.	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract **(art. 6 par. 1 lett. b) GDPR)**	**24 months.** **After that, the data will be deleted.**	The provision of data is **necessary**. The non provision of personal data may result the impossibility to participate to the selection process.
F) Redeem NFT: when you buy specific products, in the specific area you can get and redeem the relative NFT.	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract **(art. 6 par. 1 lett. b) GDPR)**	**10 years** for accounting purposes. After such period, personal data will be anonymized accordingly.	The provision of data is **necessary**. The **non provision** of personal data may result the impossibility to process your data for the present purpose, without prejudice for the other purposes.



5. RECIPIENTS OR CATEGORIES OF RECIPIENTS

Your personal data will be communicated to subjects who will process the data as data Controller or Data Processor (art. 28 GDPR) and/or as individuals acting under the authority of the Data Controller and/or Data Processor (art. 29 GDPR), for the purposes listed above. In particular, the data may be communicated to recipients based in **Italy**, belonging to the following categories:

- Subjects that provide services for the management of the information system and communication networks, including e-mail, hosting and management of the website, newsletters, etc.;
- Subjects that provide services for the management of direct marketing activities;
- For the sole purpose of research and selection of personnel (see the specifci area), any third parties and labor consultants and companies for the purposes of personnel selection, as part of assistance and consulting relationships;

- Freelancers, studies or companies within assistance and consulting relationships;
- Subjects that provide services for the management of above mentioned purposes (subjects for communication, press agencies, websites, etc.);
- Data Controller's business partners, subjects belonging to the distribution network and service and logistics companies;
- Subjects that provide services for the creation/management/redemption of NFT;
- Competent authorities for the fulfilment of legal obligations and/or provisions of public bodies, upon request;
- Companies belonging to Lunelli Group.

In addition, your data will be processed by CRM provider (Salesforce) and database marketing provider (Microsoft Azure), both within and outside the European Economic Area (EEA). In relation to the transfer of personal data outside EEA, see paragraph 6 below.

The list of Data Processors is constantly updated and available by writing to ***privacy@gruppolunelli.it*** or at the registered office of the Data Controller.

For accounting purposes, each company of Lunelli Group acts as separate data controller and provides a specific information notice to the data subjects. For managing requests relating to such purposes, Ferrari Trento will redirect the requests received through this website to the specific company involved (legitimate interests - Recital no. 48 GDPR). For this activity Ferrari F.lli Lunelli S.p.a. has been appointed as data controller (art. 28 GDPR).



6. DATA TRANSFER TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANIZATION

Personal data provided and managed through CRM for the purposes indicated above (purposes A-D) will be transferred abroad to countries outside the EEA pursuant to artt. 44 seq. of GDPR. In particular Data Controller's processors have provided appropriate safeguards, such as participating in the EU-U.S. Data Privacy Framework (DPF), reliable mechanisms for personal data transfers to the United States from the European Union / European Economic Area (art. 45 GDPR). Data Processors also have implemented Binding Corporate Rules (art. 46, par. 2, lett. b and art. 47 GDPR - BCR Binding Corporate Rules, dedicated mechanism for groups of enterprises) and Standard Contractual Clauses (SCC) adopted by European Commission (art. 46, par. 2, lett. c and lett. d of the GDPR). For more information click here, here and here.
You may obtain a copy of the conditions underlying the transfer by contacting the Controller at ***privacy@gruppolunelli.it.***



7. EXISTENCE OF AUTOMATED PROCESS

Personal data will be processed by paper-based, manual, electronic and automated means. In particular, with your consent, personal data will be processed with automated means – through a system of alignment - in order to improve Data Controller's commercial offer and services. The Data Controller will create your customer profile and analyse your habits, behaviour and choices to make proposals and offers of your interest (profiling). For more information, please contact the Data Controller at the e-mail address ***privacy@gruppolunelli.it.***



8. DATA SUBJECT'S RIGHTS

You may exercise your rights as expressed in articles 15 et seq. of the GDPR by contacting the Data Controller at the e-mail address ***privacy@gruppolunelli.it*** or at the other contacts listed above or by contacting the DPO at the e-mail address ***dpo@gruppolunelli.it***. You have the right, at any time, to request the Data Controller to access (art. 15), rectify (art. 16), cancel your personal data (art. 17) or limit their processing (art. 18). The controller shall communicate (art. 19) any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed. The controller shall inform the data subject about those recipients if the data subject requests it. In the cases provided for, you have the right to the portability of your data (art. 20) and in this case the Data Controller will provide you with a structured, commonly used, and readable form of your personal data electronically. In addition, you have the right to object (art. 21), at any time, to the processing of your data on the basis of the legitimate interest. When data processing relies on legitimate interest, information on the relative balancing test is available upon request. You have also the right to withdraw your consent without affecting the lawfulness of the processing based on the consent before withdrawal.
To stop receiving automated direct marketing communications (E-Mail, telefax, SMS, instant messaging, chat, chatbot, video messages, direct messaging on social networks or other types) you can send an e-mail at any time

to ***privacy@gruppolunelli.it*** with the subject "*no automated marketing*" or use our automatic cancellation systems provided for e-mails only.
To stop receiving traditional direct marketing communications (operator-phone calls, paper mail) you can send an e-mail at any time to ***privacy@gruppolunelli.it*** with the subject "*no traditional marketing*".
To stop receiving any direct marketing communication you can send an e-mail at any time to ***privacy@gruppolunelli.it*** with the subject "*no marketing*".
Furthermore you can withdraw the consent to profiling by sending an email at any time to ***privacy@gruppolunelli.it*** with the subject "*no profiling*".
For further details, please refer to the specific information notice in specific form/area of the website. Without prejudice to any other administrative and judicial remedy, if you believe that the processing of your personal data violates the provisions of the GDPR, you have the right to lodge a complaint with the Italian Data Protection Authority (https://www.garanteprivacy.it/web/guest/home_en).



9. CHANGES OF THE PRIVACY POLICY

The Data Controller reserves the right to modify, update, add or remove portions of the current Privacy Policy at his discretion and at any time. For this reason, this privacy policy contains an indication of the last update.

Last update: October, 2026