

## IMPALA SRL

### Introduction

Impala srl undertakes to protect the privacy of its users and declares itself responsible for the security of customer data. We shall be clear and transparent about the information we collect and what we will do with such information.

This Information Notice establishes the following:

Which user personal data are collected and processed given your relationship with us as a customer and through the use of our website, mobile applications and online services:

- Where we get the data;
- What we do with such data;
- How we store the data;
- To whom we transfer / disclose such data;
- How we handle your data protection rights;
- And how we comply with data protection regulations.

All personal data are collected and processed in compliance with Italian and EU data protection laws.

### Data Controller

Impala srl is a company enrolled with the Italian Business Register BG-451482 and has its registered office in via Marco Polo 2 / a - 24062 in Costa Volpino (BG)

### What they are and what data we collect

The term Personal Data means all information relating to users that allows us to identify them, such as their name, surname, contact details, tax code number, payment details and information on the access to our website.

We can collect the personal data of Users when:

- 1) They Leave a Contact on Our Contact Form
- 2) They purchase a product electronically online
- 3) They write to us by standard mail and are logged into our data processing systems

More specifically, we can collect the following categories of information:

- a. Name, residential address, email address, telephone number;
- b. Purchase History, including information on the products purchased and / or the special delivery services requested;
- c. Information on the purchases of the products and services provided by our trusted partners;
- d. Information on the use of our website and / or app;

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**INTERNATIONAL COMMODITIES TRADING**

- e. Communications exchanged with us or addressed to us via standard letters, email, chat service, telephone calls and social media.
- f. Location, including real-time geographical location of the computer or device via GPS, Bluetooth, and IP address, in addition to crowd-sourced Wi-Fi hotspots and repeater positions, if users use location-based features and activates geolocation services on their devices and computers

**What we do with the collected data**

User details and data provided may be used for the following purposes:

- a. To supply requested products and services: we use the information provided by users to perform the services requested on the completed contact form, or those indicated on a purchase order, or from registration in our customer area;
- b. To contact users for communications about the services requested and any changes concerning orders. These communications have no marketing purposes and can not be disabled;
- c. Administrative or legal purposes: we use user data for statistical and marketing analyses, system testing, customer surveys, maintenance and development, or to respond to a dispute or complaint. We may perform data profiling based on the information we collect from users and process it during the statistical and marketing analyses. Profiling activities shall only be performed with the prior consent of the user, whilst making every effort to ensure that all personal used are accurate. By providing any personal data, Users explicitly accept that we may use them to perform profiling activities in accordance with this Privacy Policy;
- d. Customer care service communications: we use user data to manage our consumer relations, to improve our services and boost the user experience on our website;
- e. To provide tailored services: we use the personal data of Users to provide information that we believe is of interest to them, to customise the services we offer to Users, such as special offers or points collection loyalty cards;
- f. Marketing: from time to time we shall contact our Users via electronic communication systems with information on promotions and accessory products. However, Users shall have the choice to accept or opt-out of receiving such communications, indicating their preference during registration or on the contact request form. Users are given the possibility of indicating that they wish to opt out from receiving any further direct marketing communications in every email we send.

We shall only process the personal data of Users if we have the legal basis to do so. The legal basis shall depend on the reasons for which we have collected and we must use such personal data.

In most cases we need to process the personal data of Users in order to handle a purchase transaction, stipulate the courier consignment contract for the delivery of the purchased products, and fulfil the requirements of the relative consignment contract. We may also process the personal data of Users for the following reason:

- The user has consented to the use of his/her personal data (for example, for marketing purposes);

We must also take into account the period of time for which we may need to retain the personal data in order to comply with our legal obligations (for instance, in relation to requests to exercise the right to return purchased products), or to investigate claims, requests and defend our legal rights in the event of a claim for compensation.

When we no longer need such personal data, we shall erase or destroy them using a secure procedure. We shall also assess if and how we can reduce the personal data we use over time and if we can render such personal data anonymous, so that they can no longer be associated with the user or identify the same, in which case we may use that information without notice.

### **Transfer of data abroad**

Impala srl does not transfer personal data outside of Europe or to any state or country that does not comply with the European GDPR regulation.

We use the standard means laid down in EC legislation to legitimise data transfers outside the EEA.

### **Website cookies and tracking**

This website uses cookies to enable us to improve our service and provide additional useful features to our Users (see our Cookie Policy available at [www.impala-srl.com/informativa-privacy](http://www.impala-srl.com/informativa-privacy)). This may include third-party media and advertising partner cookies that are stored on your computer or device when you visit our website or app. Please visit the websites of our partners for information on their cookie and privacy policy.

Cookies are small text files that are placed on your computer hard disk by internet browsers to allow us to recognise the user's browser and help us monitor and manage website traffic; they also allow us to recognise which products and services are most suitable for our users. A cookie contains contact information and useful information to allow us to identify the computers of Users when browsing the website and assist them during the reservation process. Most web browsers are automatically set to accept cookies but, if desired, Users can change these browser settings by accepting, opting out and erasing cookies. The "help" menu on the toolbar of most browsers explains how to prevent the browser from accepting new cookies, how to make the browser notify you when you receive a new cookie or how to opt out of receiving cookies completely. If Users choose to change these settings, certain features and functionalities may not work as expected. The cookies used do not detect any information contained on the computer.

For more information about cookies and how to opt out and prevent your browser from accepting them, please visit the following website: <http://www.allaboutcookies.org>.

We use specific software to monitor website use and traffic in order to improve the development of the design and layout of our websites. This software does not allow us to collect the personal data of users.

### **Data protection officer**

We have appointed a Data Protection Officer (DPO) to monitor compliance with this Information Notice. Users have the right to lodge a complaint with a supervisory authority at any moment in time. The Data Protection Supervisor (ITALIAN SUPERVISORY AUTHORITY) is the supervisory authority responsible for data protection for Impala srl, in its capacity as the Irish data supervisor.

## Data protection rights of Data Subjects

Under certain circumstances, Data Subjects have, by law, the right to:

- Obtain from the controller confirmation as to whether or not personal data concerning them exist and, where that is the case, which data is being processed/used and why.
- Request access to their personal data (commonly known as the "personal data access request"). This allows Data Subjects to receive a copy of the personal data in our possession and to verify correct processing of the same.
- Request the rectification of the Data Subject's personal data in our possession. This allows the Data Subject to correct any incomplete or inaccurate information.
- Request erasure of the Data Subject's personal data. This allows the Data Subject to request us to erase or remove their personal data where there are no valid reasons for continuing to process them. Data Subjects also have the right to ask us to erase or remove their personal data if they have exercised their right to object to the processing (see below).
- Object to the processing of one's personal data in which a legitimate (or third party) interest is evoked and there are elements related to a specific personal situation that lead them to object to the processing. Data subjects also have the right to object to processing where their personal data is used for direct marketing purposes.
- Object to automated decision making, including profiling, which shall not be subject to any automatic decision-making process on our part through the use of user personal details or profiling.
- Request the restriction of processing of one's personal data. This allows data subjects to ask us to suspend the processing of their personal data, for example if they want to verify the accuracy or the reasons.
- Request the transfer of personal data in structured and electronic format to the user or to another party (commonly known as the right to "data portability"). This allows data subjects to retrieve the personal data in our possession in an electronically usable format and transfer them to another party in an electronically usable format.
- Withdrawal of consent. In the limited circumstances in which data subjects may have consented to the collection, processing and transfer of their personal information for a specific purpose, they have the right to withdraw such consent for such specific processing at any moment in time. Upon receipt of the withdrawal of consent notice, we shall no longer process the user information for the originally agreed scope or purpose, other than for another legitimate basis.

To exercise any of these rights, please send an email to [impala@pec.it](mailto:impala@pec.it) or contact our DPO by email at [dpo@sitename.it](mailto:dpo@sitename.it).

There are never any costs involved in accessing personal data (or to exercise any of the data subject rights). However, if the access request is clearly unfounded or excessive, we are entitled to refuse to comply with the request in such circumstances.

We may need to request specific information from data subjects, to help us confirm their identity and to guarantee their right to access information (or exercise any of the other rights). This is another security measure to ensure that personal data is never disclosed to people who do not have the right to receive it.

**Amendments to the Privacy Information Notice**

Our Privacy Policy may be amended from time to time and any changes shall be communicated to you via an email or a notice on our website.