



INFORMATION ABOUT TREATMENT OF PERSONAL DATA

HDL Trading based in 132 Burnt Ash Road SE 12 8PU – Lee London – United Kingdom, VAT: GB 995860552 (next, “Holder”), as the data controller, informs you to according to the art. 13 D.Lgs. 30.6.2003 n. 196 (next, “Privacy Code”) and art. 13 EU Regulation n. 2016/679 (next, “GDPR”) that your data will be processed in the modality and for the following purposes:

1. Object of treatment

The Data Controller processes personal, identifying and non-sensitive data (in particular, name, surname, tax code, VAT number, email address, telephone number – next, “personal data” or “data”) communicated by you during registration on the website of the owner and/or when registering for the newsletter service offered by the Data Controller.

2. Purpose of the treatment

Your personal data are processed:

- A) Without your express consent (art. 24 lett. a, b, c Privacy Code and art. 6 lett. b, and GDPR), for the following service purposes:
- Allow you to register to the website;
 - manage and maintain the website;
 - allow you to sign up for the newsletter provided by owner and of additional services possibly requested by you;
 - perform to precontractual, contractual and fiscal duties derived by rapports with you;
 - perform to law duty, from rules, from community law or by authority order;
 - preempt or discovery fraudulent activities or damaging abuse for the website;
 - perform owner rights, right of defense in court.
- B) Only subject to your specific and distinct consent (art. 23 e 130 Privacy Code and art. 7 GDPR), for the following marketing purpose:
- Send you via email newsletter, commercial communications and/or advertising material on product or services offered by the Owner.

We remind you that if you are already our customer, we can send you commercial communications relating to services and products of the Owner similar to those of wich you have already used, except your dissent (art. 130 c. 4 Privacy Code).

3. Treatment methods

The processing of your personal data is realized by means of the indicated operations in art. 4 of Privacy Code and in art. 4 n. 2 GDPR and precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, utilization, interconnection, block, communication, deletion and destruction of data. Your personal data are subjected to treatment both paper and electronic and/or automated.

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The Owner will process personal data for the time necessary to fulfill the aforementioned purposes and in any case for no more than 10 years from the termination of the relationship for the purposes of service and for no more than 2 years from the collection of data for marketing purposes.

4. Access to data

Your data can be made accessible for the purposes pursuant to art. 2.A) e 2.B):

- To employees and collaborators of Owner of which the Owner is a member, in their capacity as agents and/or internal managers of the processing and/or system administrators;

5. Data communication

Without your express consent (ex art. 24 lett. a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), the Owner can communicate your data for the purposes referred to art. 2.A) to supervisory bodies, Judicial authorities as well as to all the other subjects to whom the communication is obligatory by law for the accomplishment of said purposes. Your data will not be disclosed.

6. Data transfer

The management and storage of personal data will be located on the European Union server of the Owner and/or third party companies responsible and duly appointed as data processors. Currently the servers are located in Europe. The data will not be transferred to outside the European Union. In any case it is understood that the data controller, where necessary, will have the right to move the server location to Italy and/or the European Union and/or non-EU countries. In this case, the Owner hereby ensures that the transfer of non-EU data will take place in accordance with the applicable legal provisions stipulating, if necessary, agreements that guarantee an adequate level of protection and/or adopting the standard contractual clauses provided for European Commission.

7. Nature of providing data and consequences of refusing to answer

The provision of data for the purposes referred to in art. 2.A) is required. In their absence, we can not guarantee you neither the registration, to the site nor the services of the art. 2.A).

The provision of data for the purposes referred to in art. 2.B) it is optional. You can therefore decide not to give any data or to subsequently deny the possibility of processing data already provided: in this case, you will not be able to receive newsletters, commercial communication and advertising material relating to the services offered by the Owner. In any case you will continue to be entitled to the services referred to in art. 2.A).



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8. Rights of the interested party

In your quality as an interested party, you have the rights set forth in art. 7 of the Privacy Code and art. 15 GDPR and precisely the rights of:

1. Obtain confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
2. Get the indication: a) of the origin of personal data; b) of the purposes and methods of treatment; c) of the logic applied in case of treatment carried out with the aid of electronic instruments; d) of the identification details of the owner, of the managers and of the designated representative pursuant to art. 5, paragraph 2 Privacy Code and art. 3, paragraph 1, GDPR; e) the subject or the categories of subject to whom the personal data may be communicated or who can learn about them as appointed representative in the territory of the State, managers or agents;
3. obtain: a) updating, rectification or, when interested, integration of data; b) the cancellation, the transformation in anonymous form or the block of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed; c) the attestation that the operations referred to in the letters a) and b) they have been communicated or disseminated, except in the case where this fulfilment proves impossible or involves a use of means manifestly disproportionate to the protected right;
4. oppose, in whole or in part: a) for legitimate reasons, the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated calls systems without the intervention of an operator by email and/or through traditional marketing methods by telephone and/or paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the data subject to exercise the right to object even only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or none of the two types of communications.

Where applicable, you also have the rights referred to in artt. 16-21 GDPR (Right of rectification, right to be forgotten, right of limitation of treatment, right to data portability, right of opposition), as well as the right of compliant to the Guarantor Authority.



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9. How to exercise rights

You can exercise rights in every moment by sending:

- a registered letter to HDL Trading address: 132 Burnt Ash Road SE 12 8PU – Lee London – United Kingdom;
- an e-mail at hdltrading.london@gmail.com

10. Minors

This website and the services of the Owner are not intended for minors under the age of 18 and the Owner does not collect intentionally personal information related to minors. In the event that information on minors were unintentionally registered, the Owner will delete them early, at the request of users.

11. Owner, manager and agents

The Owner of the treatment is HDL Trading.

The updated list of data processors and of manager is kept at the Owner's office del trattamento.

12. Changes to this information

This information may change. It is therefore advisable to check this regularly information and refer to the most updated version.