

## CUSTOMER PRIVACY NOTICE

(Art. 13 EU Regulation 2016/679 GDPR)

Dear Customer,

this notice explains in a simple and transparent way how Azadora S.r.l. collects, uses and protects your personal data and what your rights are.

### WHO WE ARE

<b>Controller</b>	Azadora S.r.l.
<b>Address</b>	50056 Montelupo Fiorentino (FI), Zona Industriale Le Pretelle, Via Gubbio Snc.
<b>Email</b>	info@azadora.it
<b>Telephone</b>	+39 0571 912085

### WHAT DATA WE PROCESS

Depending on the business relationship (e.g. fashion maison clients for whom we carry out manufacturing, heat-sealing, ultrasonic processing, laser processing, sample development, prototyping, garment making) and on any interaction with our website [www.azadora.com](http://www.azadora.com), we may process:

- **Identification data:** first name, last name (of individual customers or company contacts), tax code, VAT number, company name, contact person's role.
- **Contact data:** address (registered office and delivery address), telephone, email, any technical and style contact details.
- **Order- and service-related data:** technical specifications of the commissioned garments, models, prototypes, patterns, work sheets, materials, packaging details, order history, any production preferences (if relating to individuals, partnerships or sole proprietorships).
- **Payment-related data:** bank details, IBAN, accounting information.
- **Browsing data:** IP address, access logs, technical identifiers collected while browsing the website [www.azadora.com](http://www.azadora.com) (for the operation of the site and for aggregated statistics, as provided for in the Cookie Policy).

## WHY WE PROCESS YOUR DATA

PURPOSE	DESCRIPTION OF THE PROCESSING	LEGAL BASIS	MANDATORY NATURE
<b><i>To perform third-party manufacturing and processing contracts</i></b>	We use your data to manage orders for manufacturing, heat-sealing, ultrasonic processing, laser processing, garment making and other special processes, to coordinate sample and prototype development, to issue quotations and to provide technical and commercial support throughout the entire production cycle.	Necessity to perform a contract or pre-contractual measures (Art. 6(b) GDPR).	This processing is mandatory in order to conclude contracts with us.
<b><i>For administrative and accounting purposes</i></b>	We process your data to register and maintain the customer master data, manage invoicing, payments and accounting, and send you service communications.	Necessity to perform a contract or pre-contractual measures (Art. 6(b) GDPR).	This processing is mandatory in order to conclude contracts with us.
<b><i>To comply with tax regulations</i></b>	We use the data to issue invoices, keep the company accounts and comply with obligations under tax law.	Legal obligation (Art. 6(c) GDPR).	This processing is mandatory in order to conclude contracts with us.
<b><i>For audit activities and maintenance of company certifications</i></b>	Data relating to customers, products and processing activities may be processed as part of periodic audits carried out by certification bodies (UNI EN ISO 9001, UNI EN ISO 45001, SA8000) for the purpose of maintaining standards of quality, occupational health and safety, and social responsibility.	Legitimate interest (Art. 6(f) GDPR) of the Controller in maintaining the certifications necessary for carrying on its business.	You may object on grounds relating to your particular situation.
<b><i>In response to requests received through the website</i></b>	We process the data you provide through the contact form or by email to reply to your requests for information, quotations or other feedback.	Necessity to take pre-contractual measures at your request (Art. 6(b) GDPR).	Providing the data is necessary to receive a reply. Without it we cannot respond.
<b><i>For commercial communications (Soft Spam)</i></b>	If you are already our customer, we may email you information on similar services already purchased (e.g. new	Legitimate interest (Art. 130(4), Leg.	You may object at any time, without giving reasons.

AZADORA SRL A SOCIO UNICO

VIA GUBBIO, SNC – 50056 – MONTELUPO FIORENTINO (FI)

Tel.:0571/912085 Fax: 0571/911705 – Mail: [info@azadora.it](mailto:info@azadora.it)

technologies, production capacity, seasonal updates), without prior consent.	Decree 196/2003).
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## TO WHOM WE DISCLOSE THE DATA

<b>Tax administration and Authorities</b>	Revenue Agency, Financial Police, Labour Inspectorate and other competent Authorities for tax, social security and supervisory obligations.
<b>Certification Bodies</b>	Accredited certification bodies (e.g. DASA RÄGISTER S.p.A.) for audit activities and verification of compliance with ISO 9001 (quality), ISO 45001 (occupational health and safety) and SA8000 (social accountability) standards.
<b>Banking and financial institutions</b>	For the execution of payments, collections or financial obligations connected with the contractual relationship.
<b>IT service providers</b>	External parties providing IT services (e.g. hosting of the website www.azadora.com, management software, email, cloud services) acting as processors (Art. 28 GDPR).
<b>Couriers and logistics operators</b>	Parties entrusted with shipping and delivering finished products to customers, who receive the contact and address data strictly necessary for delivery.
<b>External professionals and consultants</b>	Accountants, consultants, lawyers, bound by confidentiality obligations.

Data are not subject to disclosure and are not transferred to third countries outside the European Economic Area.

## HOW LONG WE KEEP THE DATA

<b>10 years</b>	We retain your data for 10 years from the end of the relationship, in order to comply with tax, civil and accounting obligations required by law (Art. 2220 Italian Civil Code).
<b>More than 10 years</b>	We may retain your data for more than 10 years in the presence of pending litigation, requests from the judicial authority or other legitimate reasons (e.g. judicial protection of rights connected with the intellectual property of the models).
<b>Duration of the contract</b>	Operational data (technical specifications, models, work sheets) are kept for the entire duration of the contract and of the service provided, unless otherwise instructed by the customer or in the event of historical archiving needs for the sample collection.
<b>24 months</b>	We may send you commercial communications for a maximum period of 24 months from your last purchase from us, unless you object.

## WHAT YOUR RIGHTS ARE

The European Data Protection Regulation (GDPR) guarantees you a series of rights, which you may exercise without any formalities, using the email and telephone details indicated above.

<b>Right of access</b>	You have the right to know whether processing of personal data concerning you is underway and to know: the source of the data; the categories of data processed; the
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	recipients; the purposes of the processing; the existence of automated decision-making, including profiling; the retention period of the data.
<b><i>Right to rectification</i></b>	If your data are not correct, updated or complete, you have the right to request their rectification and/or completion and you may require the controller to communicate this to the recipients to whom the data have been disclosed, unless this proves impossible or involves disproportionate effort.
<b><i>Right to erasure</i></b>	You have the right to the erasure of your data in the cases provided for by Art. 17 GDPR and in any case when: they are no longer necessary for the purpose for which they were collected; you have withdrawn your consent to the processing and there is no other valid legal basis; you have objected to the processing and there is no overriding interest of the controller; the data are processed unlawfully; erasure is necessary to comply with a legal obligation. You have the right to have the controller communicate this to any recipients of the data, unless this proves impossible or involves disproportionate effort.
<b><i>Right to restriction of processing</i></b>	You have the right to request restriction of the processing of your data when: you contest their accuracy, for the period necessary for verification; the processing is unlawful but you do not wish the data to be erased; when the controller no longer needs them but you wish to retain them in order to exercise a right in court; when you have objected to the processing, pending verification of whether the controller's interest prevails. You have the right to have the controller communicate this restriction to any recipients of the data, unless this proves impossible or involves disproportionate effort.
<b><i>Right to data portability</i></b>	When the processing of data is based on your consent or is necessary to perform a contract and is carried out by automated means, you have the right to receive your data in a structured, commonly used format or to request that they be transmitted to another controller, where technically feasible.
<b><i>Right to object</i></b>	You may object to the processing of your personal data carried out on the basis of the legitimate interest of the controller or of a public interest, for reasons relating to your particular situation. You may object to the processing of your personal data for marketing purposes without having to give reasons for the objection.
<b><i>Right to withdraw consent</i></b>	You may withdraw at any time the consent given for the processing of your data.
<b><i>Right to lodge a complaint</i></b>	If you believe that your rights have been infringed, you may lodge a complaint with the Data Protection Authority.