

Privacy policy pursuant to Regulation (EU) 2016/679 (GDPR) and national legislation in force in UK (Data Protection Act 2018)

1. General information

illycaffè UK Limited (hereinafter also referred to as the "Company" or "illycaffè UK") hereby informs you that it will process the data you have provided in the form or after filing your form for the purposes listed in the following paragraphs. illycaffè UK may only require and process data which are instrumental to achieve the aims of this privacy policy.

2. Purposes and legal basis

illycaffè UK may process data for the following purposes:

- A.** to fulfil your information request and to take any necessary actions to fulfil your request; the processing is based on the following legal basis: consent;
- B.** to be compliant with the requirements pursuant to the **legislation** in force, **regulations** or **EU regulations** and for **legitimate interests** such as to assert or defend the rights of the Company; the processing is based on the following legal basis: legal obligations (British and European laws) as well as the legitimate interests.

3. Mandatory nature of the provision

Provision of data for the purposes under point 2 (A) of the privacy policy is optional. However, should you not provide data marked with an asterisk, your request may not be fulfilled. Failure to provide other data will have no consequences, except that such data will not be used to fulfil your request. The data processing consent of data for the purposes under point 2 (A) of the privacy policy is optional. However, should you not provide the consent, your request not be fulfilled. Data specified in point 2 (B) of this privacy policy are necessary and, should these data not be provided, your request may not be fulfilled or any further relations may be truncated.

4. Data recipient categories

For the purposes of point 2 (A) of this privacy policy, illycaffè UK may disclose data to affiliates companies/distributors/Università del Caffè, couriers/shippers. For the purposes of point 2 (B) of this privacy policy, illycaffè UK may disclose data to lawyers, solicitors, public authorities, the judiciary, the police, the post office (as the address is visible when sending any written material). illycaffè UK will only disclose data which are essential for the achievement of each of the aims of the privacy policy. The data may be disclosed on behalf of illycaffè UK, each for own role, to all subjects delegated by illycaffè UK (legal staff also external to the Company, staff in charge of the website also external to the Company, advisors also external to the Company –such as legal advisors, IT experts that may also perform the role of system administrators, quality service staff and staff in charge of the administration of the website – IT staff that may also perform the role of system administrators, external relations staff also external to the Company, mailing and enveloping staff also external to the Company and staff involved in the requests, also external to the Company – i.e. staff of the Università del Caffè for the relevant information, marketing staff for commercial information, internal auditors, trainees, staff of internal and external Data Processors) and internal and external Data Processors (such as enveloping and shipping companies, IT outsourcers, and more in general consultants performing instrumental activities such as legal and communication advisors). The list of Data Processors is always available by contacting the Data Controller.

5. Data retention

Data will be retained by illycaffè UK for the entire period necessary for the pursuit of the purposes contained in this information. The data retention period is as follows:

- for legal obligations, regulations and community regulations, data may be retained for the periods imposed by these regulatory sources;
- for the purposes described in point 2 (A) of this policy, the data can be retained until the fulfillment of the request; in any case, all data may be retained for a period necessary to assert or defend a company right according to British and European regulations.

6. Data Controller

The Data Controller is the undersigned company illycaffè UK Limited a company duly incorporated and validly existing under the laws of England & Wales, whose registered office is at Unit 7 – 8 Osyth Close Brackmills Northampton NN4 7DY, Ph: +44(0)1604 821234, e-mail sales.uk@illy.com.

7. Rights

We inform you that the GDPR and the Data Protection Act 2018, provides the possibility for the data subject to ask the Data Controller (at the above addresses) to access personal data and to correct or cancel them or limit their processing or to oppose their processing, in addition to exercising the right to data portability, as well as other rights contained in Chapter 3 of the GDPR including the revocation of consent, where provided: the withdrawal of consent does not affect the lawfulness of the processing based on consent given before revocation.

8. Complaints

The data subject can always lodge a complaint with the British Supervisory Authority whose references can be found on the website <https://ico.org.uk/>.

9. Processing procedures

Data may be processed on paper, manually, with IT and electronic means (therefore, illycaffè UK may file data both on paper and IT support). illycaffè UK has implemented safety measures to prevent any data loss, illegal use of data, misuse or unauthorised access. Data will be retained and processed by illycaffè UK in compliance with its confidentiality requirements and with the applicable local provisions (in compliance with the principles of fairness, lawfulness, transparency, and protection of the confidentiality and the rights of those concerned) strictly in line with the aims set forth in this privacy policy. Data will be processed by illycaffè UK exclusively to achieve the aims set forth in this privacy policy. Data will be filed at illycaffè UK offices and at the appointed data processors (as well as third parties who receive data as specified in point 4 of this privacy policy). Data will be entered in databases, including IT databases.

N.B. The consent can only be given by persons over 13 years, if the subject is under 13 years, he cannot use what is provided for in the purposes for which consent is required.

This privacy policy is updated as at May 27th, 2020. Such update is carried out inside of policy of constant review of the informative ones. The versions of the previous policy statements are available writing to Data Controller (e-mail: customerServiceUK@illy.com).