

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

(pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 – “GDPR”)

1. DATA CONTROLLER

The Data Controller of the personal data is Silfer S.r.l. (hereinafter also the “Controller”), with registered office at Via XXV Aprile 10, e-mail: ekinodesign@silfer.it, certified e-mail (PEC): silfer@pec.silfer.it.

Silfer S.r.l. markets, among other things, paintings and design objects under the “EKINO” brand

through its e-commerce website (hereinafter, the “Website”).

Any external Data Processors (e.g. IT service providers, e-commerce platform providers, courier companies, payment service providers) are appointed in accordance with Article 28 GDPR.

2. TYPES OF DATA PROCESSED

In the context of managing the Website and carrying out online sales of paintings and design objects,

Silfer S.r.l. processes the following categories of personal data:

a) Browsing data

- IP address;
- date and time of access;
- pages visited;
- type of browser and device used;

- data relating to the session and system logs.

b) Data necessary for account creation and/or purchase

- first name, last name;
- shipping and billing address;
- e-mail address, telephone number;
- any company data (company name, VAT number, tax code).

c) Payment data

- payment method used;
- any partial information relating to the credit/debit card (e.g. last 4 digits), where made available by the payment service provider.

The full credit/debit card details are processed directly by certified payment service providers

(e.g. banking institutions, PayPal or similar gateways) and do not pass through the Controller's systems,

except to the extent strictly necessary for the management of the transaction.

d) Data provided via contact / customer care forms

- first name, last name;
- e-mail address;
- any telephone number;
- content of the message and any attachments.

e) Data for newsletters and commercial communications

- name (if provided);
- e-mail address;
- any preferences expressed (e.g. categories of products of interest).

f) Data relating to purchase preferences

- order history;
- products viewed or added to the cart;
- any reviews left on the Website.

g) Cookies and similar technologies

The Website uses technical cookies and, with the user's consent, analytical and profiling cookies or similar

technologies. For detailed information on the use of cookies, the user is invited to consult the

dedicated Cookie Policy, available in the "Cookie Policy" section of the Website.

3. PURPOSES OF PROCESSING AND LEGAL BASES

The personal data collected through the Website are processed for the following purposes and on the legal

bases indicated below (Article 6 GDPR):

a) Management of the user account and of the e-commerce Website

- creation and management of the user account;
- management of reserved areas;
- management of the cart, wish list and purchase functions.

Legal basis: performance of pre-contractual measures and of the contract (Article 6(1)(b) GDPR).

b) Management and delivery of orders

- receipt and management of orders for paintings and design objects;
- management of payments, invoicing, shipping and returns;

- communication with the customer regarding order status.

Legal basis: performance of the contract (Article 6(1)(b) GDPR).

c) Compliance with legal obligations

- accounting, tax and record-keeping obligations;

- responding to requests from competent Authorities.

Legal basis: compliance with legal obligations (Article 6(1)(c) GDPR).

d) Customer care and handling of requests

- responding to requests for information, quotations, customisation of works, order status,

returns and complaints.

Legal basis: performance of pre-contractual or contractual measures (Article 6(1)(b) GDPR),

as well as the Controller's legitimate interest in managing customer service (Article 6(1)(f) GDPR).

e) Newsletters and marketing communications

- sending informational newsletters;

- sending promotional communications relating to the Controller's products or services, including

new collections, special offers, initiatives or events;

- sending communications relating to products and services similar to those already purchased

(so-called "soft spam"), within the limits permitted by the applicable law.

Legal basis:

- user consent (Article 6(1)(a) GDPR) for voluntary subscription to the newsletter;

- the Controller's legitimate interest (so-called "soft spam") for sending communications on products

similar to those already purchased, without prejudice to the data subject's right to object at any time.

f) Profiling (if and when activated)

– analysis of purchases, pages visited and browsing preferences for the purpose of offering personalised content and offers (e.g. types of paintings, styles, price ranges).

Legal basis: consent (Article 6(1)(a) GDPR), obtained via banner or specific account settings.

In the absence of consent, no personalised profiling activities will be carried out.

g) Website security and fraud prevention

– monitoring and prevention of fraudulent use of the Website and/or payment systems;

– legal protection and defence in the event of disputes.

Legal basis: the Controller's legitimate interest in network security and in the defence of its rights

(Article 6(1)(f) GDPR).

h) Statistics and aggregate analysis

– anonymous or aggregate analyses on sales, the most viewed products, the geographical

areas of origin of customers and the use of the Website.

Legal basis: the Controller's legitimate interest (Article 6(1)(f) GDPR), with data used in aggregate or pseudonymised form.

4. NATURE OF DATA PROVISION

The provision of data marked as mandatory in registration, contact or purchase forms is necessary

to conclude the sales contract and provide the requested services. Failure to provide such data will

make it impossible to complete the order or create the account.

The provision of data for marketing and newsletter purposes is optional. Failure to provide such data

does not prevent the user from using the Website or purchasing products, but it will prevent the

sending of promotional communications.

5. METHODS OF PROCESSING AND DATA SECURITY

Personal data are processed by electronic, telematic and, in limited cases, paper-based means,

in accordance with the principles of fairness, lawfulness, transparency and data minimisation.

The Controller adopts adequate technical and organisational measures to ensure data security,

including protection systems against unauthorised access, loss, destruction or unlawful disclosure,

as well as backup and recovery procedures and incident management policies.

The data are not subject to automated decision-making processes that produce legal effects

concerning the data subject or similarly significantly affect them, save as may be expressly

indicated in relation to profiling activities.

6. DATA RECIPIENTS

Personal data may be disclosed to the following categories of recipients, to the extent strictly

necessary for the purposes indicated:

- IT and hosting service providers, e-commerce platform operators, e-mail providers;
 - payment service providers (banks, credit card managers, PayPal or similar providers);
 - couriers and shipping companies, including international ones, for the delivery of orders;
 - consultants and professionals (e.g. legal, tax, accounting consultants), to the extent necessary
- to comply with legal obligations or to protect the Controller's rights;
- companies providing marketing and newsletter services (e.g. e-mail marketing platforms);
 - competent Authorities and/or public bodies, in compliance with legal obligations or upon their request.

These entities process the data in their capacity as Data Processors pursuant to Article 28 GDPR

or, where applicable, as independent Controllers.

7. TRANSFER OF DATA TO NON-EU / EEA COUNTRIES

Some service providers (e.g. cloud services, newsletter platforms, statistical tools) may be located or process personal data in countries outside the European Union or the European Economic Area.

In such cases, data transfers will take place in compliance with Articles 44 et seq. GDPR, on the basis of:

- adequacy decisions of the European Commission; and/or
- Standard Contractual Clauses approved by the European Commission; and/or
- other legitimate grounds for transfer provided for by the applicable legislation.

Further information on the safeguards relating to data transfers may be requested by writing to: ekinodesign@silfer.it.

8. DATA RETENTION PERIOD

Personal data are retained for as long as strictly necessary to achieve the purposes for which they were collected and, in particular:

- data relating to orders: for the entire duration of the contractual relationship and, subsequently, for the period required by accounting and tax law (as a rule, 10 years), without prejudice to any further retention in the event of disputes;
- account data: until the user requests deletion of the account or, in the event of prolonged inactivity, for a period reasonably necessary to ensure management of the Website and the protection of the Controller;
- data for newsletters/marketing: until consent is withdrawn or the right to object (opt-out) is exercised;
- data collected via contact forms: for the time necessary to handle the request and, in any case, for a period not exceeding that necessary to protect the Controller's interests;

– logs and security data: for the time necessary to ensure the security of the Website and to manage any incidents or disputes.

At the end of the above retention periods, the data will be deleted, anonymised or otherwise made no longer attributable to the data subjects, where technically possible.

9. RIGHTS OF THE DATA SUBJECT

As a data subject, the user may exercise at any time the rights provided for in Articles 15–22 GDPR,

and in particular:

– right of access: to obtain confirmation as to whether or not personal data concerning them

are being processed and, if so, to access such data;

– right to rectification: to obtain the rectification of inaccurate personal data or the completion

of incomplete data;

– right to erasure (“right to be forgotten”): to obtain the erasure of data in the cases provided

for by law;

– right to restriction of processing;

– right to data portability: to receive in a structured, commonly used and machine-readable format

the personal data concerning them that they have provided to the Controller, and to transmit those

data to another controller, where technically feasible;

– right to object: to object at any time to processing based on the legitimate interest, including

any profiling, as well as to processing for direct marketing purposes;

– right to withdraw consent: to withdraw consent at any time, without affecting the lawfulness

of processing based on consent before its withdrawal.

Requests may be addressed to Silfer S.r.l. by writing to:

– e-mail: ekinodesign@silfer.it

– certified e-mail (PEC): silfer@pec.silfer.it

The data subject also has the right to lodge a complaint with the competent supervisory authority; in

Italy, with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali,

www.garanteprivacy.it).

10. PROCESSING OF CHILDREN’S DATA

The Website and the services offered by the Controller are not intended for persons under 18 years of age.

Should Silfer S.r.l. become aware that it has collected personal data of minors without the consent,

where necessary, of the person exercising parental responsibility, it will arrange for such data to be

deleted.

11. PROFILING AND AUTOMATED DECISION-MAKING

Any profiling activities, if and when activated, will be limited to analysing the preferences

expressed by the user (purchases, pages visited, product categories) solely for the purpose of

personalising offers and content on the Website.

In any case:

– profiling will not produce legal effects or similarly significant impacts on the user;

– the user may object at any time or withdraw consent via the links contained in communications

received or by writing to ekinodesign@silfer.it

If the Controller does not carry out profiling, this information may be expressly indicated in the

updated version of this notice.

12. AMENDMENTS TO THIS NOTICE

The Controller reserves the right to amend this privacy notice at any time,

including as a result of regulatory changes or developments in the services offered via the Website

(e.g. introduction of new functionalities or new methods of international sales).

The updated version will always be available on the Website, in the section dedicated to privacy.

Last update: 21 November 2025.