# PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

**Website browsing, contact requests, newsletters, marketing communications, and tracking technologies**

## 1. Who processes your personal data

The Data Controller is **Arca Etichette S.p.A.**, VAT No. IT04875560155, with registered office at Via Edison 119, 20010 Marcallo con Casone (MI), Italy (hereinafter also referred to as "Arca").
For any questions regarding the processing of your personal data or to exercise your rights, you may contact us at: customerservice.etichette@arca.it or dpo@arca.it.
This Privacy Notice is addressed to individuals who visit the website www.arcaetichette.it and other pages managed by Arca that refer to this notice, request information or quotations, subscribe to newsletters, or receive marketing communications and invitations to events.
If we collect your data from sources other than yourself, we will provide you with the information required by applicable laws, unless otherwise permitted by such laws.

## 2. What personal data we collect

Depending on the services you use and your interactions with Arca, we may process:
**Identification and contact data:** first name, last name, email address, telephone number, company, and job title.
**Information you provide to us:** content of information requests, contact forms, and communications you send us.
**Browsing data:** IP address, date and time of access, pages visited, browser and device information, and other technical data necessary for the operation and security of the website.
**Preference data:** newsletter subscriptions, consents provided, and any modifications or withdrawals thereof.
**Email interaction data:** information relating to the presumed opening of messages, selected links, and related timestamps, collected and associated with the individual recipient only where specific consent has been provided.
**Information on commercial interests:** assessments derived from interactions with our communications, used to personalize marketing activities only where you have provided the relevant consent.
We may collect this data directly from you, through our website, in the course of business relationships, at trade fairs and events, or through other lawful sources.
We ask that you do not provide us with sensitive information, such as health-related data, unless strictly necessary to fulfill your request.

## 3. Purposes of processing and legal bases

We process your personal data to manage our business activities, respond to your requests and, where you wish, send you marketing communications and tailor them to your interests.
Some processing activities are necessary to provide the requested services or comply with legal obligations. Others are optional and carried out only with your consent, except where otherwise permitted by applicable law.

### 3.1 Website operation and security

We use the technical data necessary to enable you to browse our website, ensure its proper functioning, prevent unauthorized access, and protect our IT systems.
These activities are based on our legitimate interest in ensuring the security of the website or on the necessity to provide the requested service.

### 3.2 Management of requests and business relationships

We use the data you provide to respond to your requests, prepare quotations, manage contacts, and perform activities necessary to establish or manage a contractual relationship.

Processing is necessary in order to take steps at your request prior to entering into a contract or to perform a contract to which you are a party.

**3.3 Compliance with legal obligations and protection of rights**

We may use certain data to comply with administrative, accounting, tax, and other legal obligations.
Where necessary, we may also retain and use such data to protect our rights, including in legal proceedings, based on our legitimate interests where applicable.

**3.4 Newsletters and marketing communications**

With your consent, we may send you information by email about our products and services, company updates, promotional offers, and invitations to trade fairs, events, webinars, and other promotional initiatives.
If you are already our customer, in some cases we may send you communications about products or services similar to those you have previously purchased, without requesting additional consent, while always giving you the opportunity to object easily and free of charge.
You may unsubscribe from marketing communications at any time by using the unsubscribe link included in our emails or by contacting us directly.

**3.5 Individual email tracking**

If you provide specific consent, we may use tracking tools, including tracking pixels and tracked links, to collect information about your interactions with our emails.
In particular, we may determine whether and when an email was opened, how many openings were recorded, which links were clicked, and certain technical information relating to these interactions.
These data, associated with your email address, allow us to analyze your individual response to communications and improve their content, frequency, and relevance.
The detection of an email opening does not necessarily mean that the message has been read. Some email clients may automatically generate opening events or otherwise affect the accuracy of these measurements.
We may use the MailUp platform to send communications and manage tracking functionalities.
You may receive our newsletters even without consenting to the individual monitoring of your interactions.

**3.6 Marketing profiling**

If you provide additional consent, we may analyze information concerning your interactions with our communications, together with your contact and professional data, in order to identify your potential business interests.
For example, if you repeatedly select links relating to a specific product category, we may use this information to provide you with relevant content and initiatives or to guide subsequent contacts by our sales personnel.
This information may be used by Arca's marketing and sales teams to organize contacts, identify groups of recipients with similar interests, and personalize subsequent marketing activities.
Where profiling is based on interactions collected through email tracking tools, it will be carried out only if you have authorized both individual monitoring and profiling.
We do not use these data to make decisions based solely on automated processing that produce legal effects concerning you or similarly significantly affect you.

**3.7 How you can manage your consents**

Consent for newsletters, individual monitoring, and marketing profiling is separate and optional.
You may choose which consents to provide and may modify or withdraw them at any time, including individually.
For example, you may continue to receive newsletters without authorizing the monitoring of your interactions or marketing profiling.
You can manage your preferences through the "Preference Center" link included in our communications or by contacting us at the addresses indicated in Section 1.
Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

**4. Cookies and technologies used on the website**

Our website may use cookies and other technologies that allow information about browsing activities to be collected.
Some of these tools are necessary for the operation and security of the website and do not require your consent. Other tools, such as those used for non-exempt statistical analysis, marketing, and profiling, are enabled only with your consent where required by law.
Through the cookie management panel, you can accept, reject, or modify your preferences at any time, without rejection of optional tools affecting your normal browsing experience.
For information on the cookies and other tools actually used, their purposes, and retention periods, please refer to our Cookie Policy available on the website.
Preferences expressed for website cookies are independent from those relating to email monitoring.
Emails may contain tracking pixels configured so as not to measure the behavior of individual recipients or, where possible, to anonymize additional technical data collected. Such tools do not require consent because they are distinct from individual monitoring activities.

**5. Nature of data provision**

Providing the data necessary to respond to your request or deliver a service is required to the extent necessary to carry out the requested activity. If you do not provide such data, we may be unable to fulfill your request.
Providing additional data and granting consent for newsletters, individual monitoring, and marketing profiling is optional. Failure to provide consent will not prevent you from browsing the website, requesting information, or using other available services.

**6. Who may have access to your data**

Your data may be processed by authorized Arca personnel as necessary for the performance of their duties.
We may also engage external service providers, including:
IT, hosting, maintenance, and cybersecurity service providers;
Newsletter distribution and management providers, including MailUp;
Consultants, professionals, and other service providers where necessary for the performance of their activities;
Public authorities and governmental bodies where required by law.
Service providers processing data on our behalf receive specific instructions and are required to ensure an appropriate level of data protection.
Where other parties process data for their own purposes or under joint responsibility with Arca, we will provide the necessary information regarding their respective roles.
Your personal data are not disclosed indiscriminately to the public.

**7. Can your data be transferred outside Europe?**

Certain technology providers, cloud services, or third-party tools may involve the transfer of personal data to, or access to personal data from, countries outside the European Economic Area (EEA).
Where this occurs, we implement the safeguards required by applicable laws to ensure an adequate level of protection for your personal data.
Such safeguards may include transfers to countries recognized as providing an adequate level of protection by the European Commission, the use of specific contractual arrangements, and, where necessary, additional protective measures.
You may request further information regarding transfers and applicable safeguards by contacting us using the details provided in Section 1.

**8. How long we keep your data**

We retain your data only for the period necessary to achieve the purposes for which they were collected, unless a longer retention period is required by law or necessary to protect our rights.

In particular:

**Contractual, administrative, and accounting data:** retained for the periods required by law and, where necessary, for the protection of our rights.

**Data used for direct marketing:** retained until consent is withdrawn and, in any case, for no longer than 24 months from the last meaningful interaction with our communications.

**Data used for profiling:** retained for no longer than 12 months from collection or the last recorded relevant interaction, unless consent is withdrawn earlier.

**Technical and security data:** retained for the period necessary to ensure system security, service continuity, and protection of our rights.

At the end of the applicable retention periods, data are deleted or anonymized unless further retention is necessary to comply with legal obligations or protect our rights.

**9. How we protect your data**

We implement appropriate technical and organizational measures to protect your personal data against unauthorized access, loss, misuse, or unlawful disclosure.

These measures include, among others, personnel authorization management, protection of IT systems, data minimization, access controls, and supplier assessments.

Access to information relating to individual monitoring and profiling is restricted to authorized personnel and limited to the purposes for which consent has been provided.

We also assess processing risks in advance and, where necessary, adopt additional protective measures.

**10. What are your rights?**

Data protection laws grant you various rights, which you may exercise where applicable.

In particular, you may:

Access your data: obtain confirmation as to whether your data are being processed and receive a copy thereof.

Request rectification: have inaccurate data corrected or incomplete data completed.

Request erasure: obtain deletion of your data where the legal conditions are met.

Request restriction of processing: require processing to be limited in certain circumstances.

Request data portability: receive your data in a structured, commonly used, and machine-readable format and, where technically feasible, have them transferred to another controller.

Object to processing: request that your data no longer be processed for certain purposes where permitted by law.

Withdraw consent: withdraw one or more previously granted consents at any time.

You may always object, free of charge, to the processing of your personal data for direct marketing purposes, including profiling related to such activities. In this case, we will cease processing your data for those purposes.

To exercise your rights, please contact:

**dpo@arca.it**

or

**customerservice.etichette@arca.it**

We will respond within the timeframes required by applicable law.

If you believe that the processing of your personal data does not comply with data protection laws, you may lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) via www.garanteprivacy.it.

You also retain the right to seek judicial remedies before the competent courts.

**11. Updates to this Privacy Notice**

We may update this Privacy Notice to reflect regulatory, organizational, or technological changes.
The latest version will always be available on our website.
If changes concern material aspects of the processing activities, we will inform you using appropriate methods and, where necessary, request renewed consent.