# NEWSLETTER PRIVACY NOTICE

Last updated: 15/11/2026

This Privacy Notice, provided pursuant to Articles 13 and 14 of EU Regulation 2016/679 (the "GDPR"), concerns the processing of personal data carried out by Seika, a brand belonging to Tubertini S.r.l. ("Tubertini"), for the purpose of managing its informational and promotional newsletters, providing informational updates and carrying out other marketing activities.

**Data Controller**
For the purposes of this Privacy Notice and the processing activities described herein, the Data Controller is Tubertini S.r.l., with registered office at Via Muzza Spadetta, 40053 Valsamoggia (BO), Italy.
Data Protection Officer (DPO) contact e-mail address: info@tubertini.it.

**Personal Data Processed by Tubertini**
Tubertini may collect and process the following personal data relating to data subjects:
- Personal identification data (first name, surname);
- Contact details (e-mail address).

**Information on Data Processing**
The personal data of data subjects will be processed for the purposes and on the legal bases described below and retained for the periods specified herein.

**Marketing and Informational Communications**
Purposes: Sending marketing, promotional and informational communications, including commercial newsletters and informational newsletters managed by Tubertini. Marketing activities may concern both Tubertini products and those of brands belonging to Tubertini, as well as products and services offered by third-party partners operating in the following sectors: environment, sports, publishing and consumer goods. Such activities may also include the distribution of advertising materials, direct sales, and the conducting of surveys and market research.
Legal basis: For the purposes described above, processing is based on the data subject's freely given consent, which may be withdrawn at any time (Article 6(1)(a) GDPR).
Consequences of failure to provide data: Providing personal data for marketing purposes is optional. However, in the absence of such data and the relevant consent, Tubertini will not be able to send promotional and marketing communications to data subjects.
Data retention period: Personal data collected for marketing purposes will be retained until consent is withdrawn and, in any event, for a maximum period of 24 (twenty-four) months, unless consent is withdrawn earlier.

**Compliance with Legal Obligations**
Purpose: To fulfil the legal obligations to which Tubertini is subject.
Legal basis: Processing is necessary for compliance with legal obligations to which Tubertini is subject (Article 6(1)(c) GDPR).
Consequences of failure to provide data: The data concerned are those already collected by Tubertini at the time of newsletter subscription or, where required, when consent was given.
Data retention period: For the period necessary to fulfil the specific legal obligations to which Tubertini is subject.

**Protection of Tubertini's Rights**
Purpose: To protect Tubertini's rights and legitimate interests in judicial or administrative proceedings, or before other competent authorities.
Legal basis: Tubertini's legitimate interest (Article 6(1)(f) GDPR).
Consequences of failure to provide data: The data concerned are those already collected by Tubertini at the time of newsletter subscription or, where required, when consent was given.
Data retention period: For the period necessary to protect Tubertini's rights and legitimate interests in cases where such protection is effectively required.

**Methods of Processing and Security of Personal Data**
The personal data of data subjects are processed using electronic, IT and/or paper-based systems, in compliance with the principles of fairness, lawfulness, transparency, accuracy, integrity, data minimisation, purpose limitation and storage limitation, as well as with the provisions of the GDPR and applicable personal data protection legislation.
Tubertini adopts appropriate security measures (physical, technical and organisational) to protect personal data against potential breaches, including accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data, and to ensure that data are processed exclusively for the purposes described in this Privacy Notice.

**To Whom We Disclose Personal Data**
Where necessary for the purposes described in this Privacy Notice, the personal data of data subjects may be disclosed to the following recipients:
- Providers responsible for managing Tubertini's newsletters;
- Service providers (e.g. IT consultants, marketing consultants, backup and data storage service providers, cloud service providers and e-mail service providers);
- Professionals and consultants engaged by Tubertini;
- Competent authorities and law enforcement agencies.

Depending on the circumstances, the recipients of personal data may process such data in their capacity as Data Processors, independent Data Controllers or Joint Controllers. Further information regarding the identity and contact details of such recipients may be obtained by contacting Tubertini using the details provided in the section entitled "How to Contact Us" of this Privacy Notice.

**Transfer of Personal Data Outside the EEA**
Where, in pursuing the purposes described in this Privacy Notice, the personal data of data subjects are transferred to countries outside the European Economic Area ("EEA"), Tubertini ensures that such transfers are carried out in a manner that guarantees the full protection of data subjects' rights and freedoms.
Where the European Commission has not adopted an adequacy decision in respect of the third country receiving the data, transfers will be carried out in full compliance with the provisions of Articles 44–50 of the GDPR.

**Data Subjects' Rights**

In accordance with applicable legislation, and in particular the provisions of the GDPR, each data subject has the following rights in relation to the personal data processed by Tubertini:
Right of Access: The right to obtain information about the processing of their personal data and to receive a copy of such data (Article 15 GDPR).
Right to Rectification: If they believe that their personal data are inaccurate or incomplete, they may request that such data be corrected or updated in accordance with their instructions (Article 16 GDPR).
Right to Erasure (the "Right to be Forgotten"): Subject to applicable legal provisions, data subjects have the right to request the erasure of their personal data where:

(i) the data are no longer necessary for the purposes for which they were collected and processed;
(ii) they withdraw their consent to the processing, where the processing is based on consent;
(iii) they object to the processing for direct marketing purposes or to processing carried out for other purposes, and there are no overriding legitimate grounds for continuing the processing;
(iv) their personal data have been unlawfully processed;
(v) erasure is required by law;
(vi) they are a minor and their personal data have been collected in connection with newsletter subscription (Article 17 GDPR).

Right to Restriction of Processing: Data subjects may request the restriction of the processing of their personal data where:

(a) they contest the accuracy of the personal data, for a period enabling the Data Controller to verify their accuracy;
(b) the processing is unlawful and they oppose the erasure of the personal data, requesting instead that their use be restricted;
(c) the Data Controller no longer needs the personal data for the purposes of processing, but the data subject requires them for the establishment, exercise or defence of legal claims;
(d) they have objected to the processing pursuant to Article 21(1) GDPR, pending verification as to whether the legitimate grounds of the Data Controller override those of the data subject (Article 18 GDPR).

Right to Object: On grounds relating to their particular situation, data subjects have the right to object to the processing of their personal data based on the legitimate interests of the Data Controller (Article 6(1)(f) GDPR).

In such cases, the Data Controller shall cease processing the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or where the processing is necessary for the establishment, exercise or defence of legal claims.

The right to object to the processing of personal data for direct marketing purposes is absolute and may be exercised at any time.

An objection to processing carried out by automated means also applies to processing carried out using traditional methods (Article 21 GDPR).

Right to Withdraw Consent: Where the processing of personal data is based on consent, data subjects have the right to withdraw their consent at any time (Article 7 GDPR).

Right to Data Portability: Where processing is based on consent or a contract and is carried out by automated means, data subjects have the right to receive the personal data they have provided to the Data Controller in a structured, commonly used and machine-readable format and, where technically feasible, to have such data transmitted directly to another Data Controller.

**Right to Lodge a Complaint with a Competent Supervisory Authority**
To safeguard their rights and protect their personal data, data subjects may, at any time, lodge