

PRIVACY POLICY – PERSONAL DATA PROCESSING NOTICE

1. Purpose of the document and scope of application

Dear user, this document, prepared pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR"), describes the general methods for processing your data when you access the website www.marziaclinic.com (hereinafter, the "Website").

2. Data Controller and contact details

F.G. Cosmetics s.r.l. (hereinafter referred to as the "Controller") is the data controller. The Controller can be contacted via email at info@marziaclinic.com or at its registered office in Olcella di Busto Garolfo (MI), Via Tosi, no. 17/19.

3. Categories of personal data processed

The processing involves the use of the following categories of personal data:

- **Browsing data:** information collected automatically, necessary to establish and maintain a connection to the Website and to operate the web protocol (e.g., IP address, browser type, location, type of device used);
- **Data collected via cookies:** if you consent to the installation of cookies and other trackers, your data will be processed in accordance with our [cookie policy](#), based on the purposes pursued through the cookies used;
- **Data provided directly by the user:** in some cases, the Website may request (or you may voluntarily provide) personal data, such as when filling in and submitting the form for signing up to the reserved area or subscribing to the newsletter.

4. Purpose of use and legal basis

Personal data will be processed for specific purposes, based on a legal basis provided by law, as detailed below.

- **Website management**
To ensure connection stability and regular internet protocol functionality, browsing data such as the IP address, browser, and device information are used. The processing is carried out as it is necessary to provide a requested service, pursuant to Art. 6(1)(b) GDPR.
- **User account management**
When a user creates an account and makes purchases for commercial purposes, the related data is used to process such activities, to perform a requested service, pursuant to Art. 6(1)(b) GDPR.
- **Newsletter subscription**
If you choose to subscribe to our commercial newsletter, we will use your email address and name to send relevant commercial communications. The processing is based on your expressed consent, pursuant to Art. 6(1)(a) GDPR.
- **Service improvement**
Information on user activity is used to evaluate service improvements. For instance, data on a malfunctioning page may be used to fix it. The processing is based on the

Controller's legitimate interest in improving the application and user experience, pursuant to Art. 6(1)(f) GDPR.

- **Security**

Information on user activity and system logs is used for security purposes, such as detecting abnormal behavior and potential cyberattacks. The processing is based on the Controller's legitimate interest in ensuring infrastructure and data security, pursuant to Art. 6(1)(f) GDPR.

- **Legal obligations**

Certain data are processed to comply with legal obligations, such as tax regulations. This processing is necessary to fulfill a legal obligation, pursuant to Art. 6(1)(c) GDPR.

- **Legal defense**

In case of legal disputes, data may be used to assert the Controller's rights or to defend against user or third-party claims. In such cases, it is not possible to foresee the specific data to be processed, but only the data necessary to prove the Controller's rights will be processed. The legal basis is the legitimate interest of the Controller, pursuant to Art. 6(1)(f) GDPR.

5. **Consent information**

Consent is optional and can be withdrawn at any time. Failure to provide consent will only result in the inability to receive the newsletter. You can withdraw your consent at any time by clicking the unsubscribe button in the commercial emails or by sending an email to info@marziaclinic.com.

6. **Cookies and trackers**

This Website uses cookies and other tracking tools to ensure correct network operation, perform statistical analyses, and remarketing activities.

You can choose which cookies to install based on their purposes by selecting your preferences in the cookie banner shown on your first visit. You may also change your preferences later via the appropriate settings.

For more details, please consult the [cookie policy](#).

7. **Data retention**

Your personal data will be retained for as long as necessary to fulfill the purposes for which they were collected. Data used for website management is stored until the end of the session, while newsletter data is retained as long as the subscription is active. Data collected for account management, service improvement, security, and legal compliance will be stored for no more than 10 years, depending on the specific purpose.

8. Data sharing and international transfers

The Controller processes data through its internal organization using properly trained and authorized personnel and through external companies acting on its behalf as data processors. In such cases, the Controller ensures that third parties process data at a protection level adequate to safeguard the rights and freedoms of individuals. An updated list of data processors is available upon request at info@marziaclinic.com.

If required by judicial authorities and under the appropriate legal conditions, data may be provided to such authorities for crime prevention and investigation purposes.

Personal data may be transferred outside the European Economic Area only in compliance with the safeguards set out in Chapter V of the GDPR.

9. Nature of the data provision

The provision of personal data is always optional, except for network protocol data, which is necessary for the connection to the Website to function.

10. How personal data is protected

The Controller undertakes to implement appropriate technical and organizational measures to maintain and ensure the confidentiality, integrity, and security of personal data, and to prevent any loss, misuse, alteration, or unauthorized access. The Controller also conducts periodic checks on its systems to identify potential vulnerabilities and attacks.

11. Data subject rights

You may at any time, where the legal conditions are met, obtain access to your personal data, request their correction, erasure, or restriction of processing. You may also object to the processing where provided by law (Articles 15 et seq. of the GDPR). To exercise your rights, you can contact info@marziaclinic.com.

If you believe that your personal data is being processed in violation of the data protection legislation, you have the right to lodge a complaint with the Supervisory Authority (Art. 77 GDPR, <https://www.garanteprivacy.it/home/diritti/come-agire-per-tutelare-i-tuoi-dati-personali>) or bring a claim before a court (Art. 79 GDPR and Art. 140-bis of Legislative Decree 196/2003).