

Information provided pursuant to article 13 of Regulation 2016/679 (GDPR or General Data Protection Regulation) and to Legislative Decree 196/2003 and subsequent modifications.

The Owner of the website you are browsing gathers personal data. The personal data collected are processed in compliance with the principles of lawfulness, correctness and transparency provided for by Article 5 of the GDPR, also with the aid of IT and telematic tools designed to store and manage the data – and, in any case, in such a way as to ensure their security and to safeguard maximum confidentiality for the interested party. This document is intended to provide you with all the necessary information on what data are processed, and for what purposes.

a) The **Data Controller** is Sagarti, with registered office in Penza (Russia), Pushkina Str.43, VAT 5836676591. You may contact the Data Controller in the following ways:

- by regular mail to the following address: Pushkina Str.43, Penza (Russia);
- by sending a WhatsApp message to the number +7 927 3992285;
- by calling 8 800 7750276;
- by e-mail to the regular e-mail address info@sagarti.com or to the certified e-mail address ... ;
- through the contact form on the "[Contacts](#)" page of this website;
- via chat, which you can access from all the pages of the web site.

The Controller will respond in Russian or English.

b) The Controller's **Representative** on EU territory is ... ;

c) The Data Controller may ask you to provide the following types of **personal data**: 1. identification data such as your personal details (name, surname) and the company you are part of; the country from which you write; your IP address; your website usage data; and the data provided for in the [Cookie Policy](#); 2. contact details such as e-mail address, landline or mobile telephone number, URL of your company website.

d) The personal data referred to in point c) of this document, are processed in accordance with the **legal bases** and for the **purposes** listed below:

- consent given by the data subject to the processing of his or her personal data (Article 6, paragraph 1, letter a, GDPR). You can decide whether or not to give your consent if you want to subscribe to our newsletter to be informed of new products as well as new initiatives and activities. The provision of data that has consent as its lawful basis – and therefore the consent itself to the collection and processing of such data – is always optional and, once given, can be revoked at any time without affecting to the lawfulness of any processing based on the consent given before such revocation. However, if you deny your consent, it may not be possible for us to provide some services, and the quality of your website browsing experience may be affected;

- the processing is necessary for the performance of a contract to which the data subject is party, or for the fulfillment of pre-contractual steps adopted at their request (Article 6, paragraph 1, letter b, GDPR). You must necessarily provide us with your contact details, if you want information on one or more of our products that you intend to purchase. If you do not provide these data, it will be impossible for us to contact you; as a consequence, they are mandatory.

Your personal data, together with your contact details, are necessary to provide you with a quote if you are interested in learning the price of one or more of our products. If you decide not to provide us with such data, it will not be possible to compile a quote and send it to you, so they are mandatory.

This website does not require any further personal data under this lawful basis. Further personal details (e.g. tax details, payment details, shipping address) may be required to stipulate and fulfill a contract;

- the processing is necessary to fulfill a legal obligation to which the data controller is subject (Article 6, paragraph 1, letter c, GDPR), including any tax obligations if a contract is stipulated between the Data Controller and the User;

- the processing is necessary for the pursuit of the legitimate interest of the Data Controller or of third parties, deemed to prevail over the interests or fundamental rights and freedoms of the concerned individual, such as: direct marketing purposes with interested parties who are existing customers; to prevent fraud or any other crimes; to guarantee the security of the network and data of the Data Controller's IT systems; for defense in Court;

e) Your personal data collected and processed on the basis of this site's Policy will be processed by the employees and collaborators of Sagarti in their capacity as **Authorized Data Processors** entrusted with managing said data and providing the services thereof (e.g. sending technical information on the products, compiling, and sending estimates, etc.). This will take place in compliance with the current legislation on the processing of personal data.

Personal data may also be disclosed to the following **recipients** or **categories of recipients**:

- To any subjects identified as Data Processors, whose updated list is always available to the Data Controller, and to subjects identified by them as Data Processor Supervisors or Authorized Data Processors;
- To the relevant Authorities for tax reasons;
- To Public Security Authorities or any other public bodies for purposes of defense, State security and investigation

- of crimes, or to the Judicial Authority in compliance with legal obligations in relation to alleged criminal offences;
- To the relevant Judicial Authorities, including foreign ones and their employees and auxiliaries, to the lawyers and to any collaborators and/or employees and/or data processors, to the ADR (Alternative Dispute Resolution) bodies – including foreign or international ones – and arbitrators or arbitration boards – including foreign or international ones – in the event of a dispute concerning the pre-contractual or contractual relationship that may arise between the Data Controller and the User;
- To the service providers listed in the [Cookie Policy](#).

Outside of these cases, your personal data will not be disclosed or otherwise shared with any third parties.

f) Your personal data will be transferred to a **third Country**, given that the Data Controller is based in Russia. Furthermore, some service providers are also based in a third Country (see [Cookie Policy](#)). **To date, the European Commission has not adopted an Adequacy Decision pursuant to the GDPR concerning the transfer of data to subjects or entities based in Russia.**

Below are the GDPR provisions regarding the transfer of personal data abroad (i.e. in a country that is not a member of the European Union). For a simplified explanation, please visit the relevant page on the website of the [Italian Data Protection Authority](#).

Article [45 of the GDPR](#) states that the transfer of personal data to a third Country or an international organization may occur if the Commission has ruled that the third Country, a territory, or one or more specific sectors within that third Country, or the international organization in question, ensure an adequate level of protection. Such transfer shall not require any specific authorization.

When assessing the adequacy of the level of protection, the Commission shall take account of the following elements (Article 45, paragraph 2, GDPR):

- a) the rule of law, respect for human rights and fundamental freedoms, relevant legislation, both general and sectoral (including concerning public security, defense, national security and criminal law and the access of public authorities to personal data), as well as the implementation of such legislation, data protection rules, professional rules and security measures, including rules for the onward transfer of personal data to another third country or international organization which are complied with in that country or international organization, case-law, as well as effective and enforceable data subject rights and effective administrative and judicial redress for the data subjects whose personal data are being transferred;
- b) the existence and effective functioning of one or more independent supervisory authorities in the third country or to which an international organization is subject, with responsibility for ensuring and enforcing compliance with the data protection rules, including adequate enforcement powers, for assisting and advising the data subjects in exercising their rights and for cooperation with the supervisory authorities of the Member States; and
- c) the international commitments the third country or international organization concerned has entered into, or other obligations arising from legally binding conventions or instruments as well as from its participation in multilateral or regional systems, in particular in relation to the protection of personal data.

Pursuant to paragraph 3 of Article 45 of the GDPR, the Commission, after assessing the adequacy of the level of protection, may decide, by means of implementing acts, that a third country, a territory, or one or more specific sectors within a third country, or an international organization, ensure an adequate level of protection pursuant to paragraph 2 of article 45. The implementing act shall provide for a mechanism of periodic review, at least every four years, which shall consider any relevant developments in the third country or the international organization. The implementing act specifies its geographical and sectoral scope of application and, where applicable, identifies the supervisory authority or authorities referred to in paragraph 2, letter b), of Article 45 of the GDPR. The implementing act shall be adopted in accordance with the examination procedure referred to in Article 93, paragraph 2, of the GDPR.

Article 45, paragraph 4 of the GDPR provides that the Commission monitors on an ongoing basis the developments in third countries and international organizations that could affect the functioning of the decisions adopted pursuant to paragraph 3 of Article 45 of the GDPR, and of the decisions adopted pursuant to Article 25, paragraph 6 of Directive 95/46/EC.

Where available information reveals – in particular following the review referred to in paragraph 3 of Article 45 of the GDPR – that a third country, a territory or one or more specified sectors within a third country, or an international organization, no longer ensure an adequate level of protection within the meaning of paragraph 2 of Article 45 of the GDPR, paragraph 5 of the aforementioned article gives the Commission the power to revoke, modify or suspend to the extent necessary the decision referred to in paragraph 3 by implementing acts without retro-active effect. Such implementing acts shall be adopted in accordance with the examination procedure referred to in Article 93, paragraph 2; or, in cases of extreme urgency, in accordance with the procedure referred to in Article 93, paragraph 3. On duly justified imperative grounds of urgency, the Commission shall adopt immediately applicable implementing acts in accordance with the procedure referred to in Article 93, Paragraph 3.

The Commission shall initiate consultations with the third country or international organization, with a view to remedying the situation that caused to the decision made pursuant to paragraph 5 of Article 45 of the GDPR.

A decision pursuant to paragraph 5 will not affect the transfers of personal data to the third country, a territory, or one or more specified sectors within that third country, or the international organization in question pursuant to Articles 46 to 49. The Commission publishes in its Official Journal and on its website the list of third countries, territories, and specific sectors within a third country, and some international organizations, for which it has decided that an adequate level of protection is or no longer is ensured.

The decisions adopted by the Commission on the basis of Article 25, Paragraph 6, of Directive 95/46/EC shall remain in force until they are amended, replaced, or repealed by a Commission decision adopted in accordance with paragraph 3 or 5 of Article 45 of the GDPR.

However, in accordance with the purposes specified in point d) of the notice as well as Article 49 of the GDPR, we remind you that the transfer is required for the fulfillment of any contracts or precontracts between you (or another person or legal entity acting on your behalf) and the Data Controller.

Should you decide to provide the Data Controller with your personal data for the purposes listed, you must be informed that:

g) any data collected for marketing purposes will be stored for a period of 24 months; the data required for the fulfillment of pre-contractual obligations for a period of 1 year; the data necessary for the fulfillment of contractual obligations for as long as necessary to reach the statute of limitation for any legal actions that could be filed against the Data Controller; the data necessary for the fulfillment of legal obligations will be kept for the time necessary for the fulfillment requested;

h) subject to the free, explicit, informed, and freely revocable consent given by the User, the Data Controller may use the latter's personal data to analyze their behavior and study their preferences in order to suggest content in line with their personal characteristics. We therefore invite you to check our [Cookie Policy](#) to see how your data are used for the relevant purposes, and how you can grant or withdraw your consent, or manage your preferences.

i) **you can at any time exercise the rights provided for in articles 15 to 22 of EU Regulation no. 2016/679**, and therefore it is your right to: **1)** request confirmation of the existence or otherwise of your personal data; **2)** obtain information about the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom your personal data have been (or will be) communicated and, when applicable, the retention period; **3)** obtain the rectification and cancellation of data; **4)** obtain the limitation of the processing; **5)** obtain data portability, i.e. receive them from a data controller, in a structured format, commonly used and readable by an automatic device, and transmit them to another data controller without hindrance; **6)** oppose to the processing at any time, including in the case of processing for direct marketing purposes; **7)** oppose to any automated decision-making process regarding natural persons, including profiling. **8)** ask the data controller to access your personal data, to correct or cancel them, to limit their processing or to oppose their processing, in addition to having the right to data portability; **9)** withdraw your consent at any time, without affecting the lawfulness of the treatment based on the consent given prior to such revocation; **10)** lodge a complaint with a supervisory authority.