Privacy Policy

Effective date: 26 August 2025

1) Who we are

Controller: Siena Living srl VAT: IT12345670967 Website: sierraliving.it Phone: +39 0577 1820155 Email (privacy): privacy@sierraliving.it Data Protection Officer (DPO): Avv. Laura Bianchi — dpo@sierraliving.it

We design, sell and deliver furniture to both consumers and business customers (B2C and B2B). This notice explains how we handle personal data under the EU GDPR and applicable laws.

2) What data we process and why (legal bases)

Context	Data (examples)	Purpose	Legal basis
Browsing the site & cookies	IP, device info, pages viewed, session IDs, cookie IDs	Run the site, keep it secure, measure audiences, improve UX; show/measure ads where applicable	Legitimate interest for essential/analytics (where allowed); Consent for non-essential/marketing cookies. See Cookie Policy.
Account & checkout (B2C)	name, email, phone, billing/shipping address, order details, VAT/tax codes where applicable	Create/manage your account, process orders, deliveries, returns, warranties	Contract necessity; Legal obligation (tax & accounting)
Orders & contracts (B2B)	company details, contact person's name, work email/phone, role	Quotes, contracts, fulfilment, after-sales	Contract necessity; Legitimate interest to manage business relationships
Payments	masked card data, transaction IDs (processed by payment providers)	Take payments, prevent fraud	Contract necessity; Legitimate interest (fraud prevention)
Customer care	interactions via chat, email, phone, tickets	Support, resolve issues, quality/training	Contract necessity; Legitimate interest
Marketing (email/SMS/push)	email/phone, preferences, engagement	Send offers, news, abandoned cart reminders	Consent; for existing customers, legitimate interest/soft opt-in with opt-out any time
Reviews & UGC	name/nickname, review content, ratings, photos	Publish reviews, moderate content	Consent; Legitimate interest

Events & B2B outreach	badge scans, business cards, LinkedIn/work contacts	Follow-ups, demos, proposals	Legitimate interest
Security & fraud	logs, device signatures, risk signals	Keep services and users safe	Legitimate interest; Legal obligation where applicable

We do **not** require special category data; please don't share it with us.

3) Where data comes from

Directly from you; from your use of the site (cookies/SDKs); from payment/delivery partners (e.g., transaction or tracking updates); from public business sources (for B2B, e.g., your company website or trade events).

4) Retention

Data	Typical retention	
Account/profile	while the account is active; then 24 months for logs/backups	
Orders, invoices, tax records	10 years (legal obligation)	
Customer care tickets	up to 36 months	
Marketing consents & unsubscribes	while you remain subscribed; suppress list kept indefinitely to honour opt-outs	
Analytics/cookie identifiers	per cookie life; see Cookie Policy	
Security/fraud logs	up to 24 months, longer if needed for incidents	

5) Who we share data with (processors/recipients)

- Payment processors and anti-fraud services.
- Logistics & delivery partners and returns/repair centers.
- Hosting, CRM, ticketing, communications and analytics providers.
- Marketing & advertising partners (only with your consent where required).
- Professional advisors and authorities when required by law.

We require processors to protect your data and only act on our instructions.

6) International transfers

Some providers may operate outside the EEA. When that happens, we use GDPR safeguards (e.g., **EU Standard Contractual Clauses**, transfer impact assessments, and additional measures) or rely on adequacy decisions.

7) Your rights

You can request access, rectification, erasure, restriction, portability, and object to processing based on legitimate interests, as well as withdraw consent at any time (without affecting past processing). You can also lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali, www.garanteprivacy.it).

8) How to exercise rights

Email <u>privacy@sierraliving.it</u> or the **DPO at <u>dpo@sierraliving.it</u>**. We may ask you to verify your identity and will respond within statutory deadlines.

9) Marketing, newsletters & profiling

- You can unsubscribe anytime via links in messages or by contacting us.
- Where we rely on legitimate interest/soft opt-in (emails about similar products to existing customers), you can object at any time.
- We may use basic segmentation (e.g., purchase history, location) to keep messages relevant; no decisions with legal or similarly significant effects are made solely by automated means.

10) Cookies & similar tech

See our separate **Cookie Policy** for details on categories, lifetimes, and third-party tools, and to manage your preferences: **/cookie-policy**.

11) Security

We use technical and organizational measures such as encryption in transit, access controls, least-privilege, backups, and vendor due-diligence to protect personal data.

12) Minors

Our services are intended for adults and professional customers. We don't knowingly collect data from minors under the age required by law. If you believe a minor has provided data, contact us and we'll delete it where required.

13) Updates to this notice

We'll post changes here and update the effective date. For significant changes, we'll provide additional notice (e.g., email or in-product).

14) Contact

Siena Living srl — VAT IT12345670967 Privacy inquiries: <u>privacy@sierraliving.it</u> **DPO:** Avv. Laura Bianchi — <u>dpo@sierraliving.it</u> Phone: +39 0577 1820155