RONCHI DI
MANZANO
SOCIETÀ AGRICOLA • FRIULI COLLI ORIENTALI

PRIVACY NOTICE AND RELEASE FOR IMAGES, VIDEO AND SOCIAL MEDIA

Privacy notice pursuant to Articles 13 and 14 of Regulation (EU) 2016/679

Persons photographed or recorded during visits, tastings, events, weddings, company activities or promotional initiatives.

Data Controller	Società Agricola Ronchi di Manzano S.r.l.
Registered office	Via Orsaria 42, 33044 Manzano (UD)
Contact details	+39 0432 740718 – info@ronchidimanzano.com
Version	Operational edition – August 2026

1. Identity and contact details of the Data Controller

The Data Controller is Società Agricola Ronchi di Manzano S.r.l., with registered office at Via Orsaria 42, 33044 Manzano (UD), VAT No. 03184670309. For requests concerning the protection of personal data, you may contact info@ronchidimanzano.com or call +39 0432 740718. Requests are handled by authorised personnel and, where necessary, by the appointed privacy and legal advisers.

2. Scope and data subjects concerned

Persons photographed or recorded during visits, tastings, events, weddings, company activities or promotional initiatives.

This privacy notice applies to processing carried out using paper-based, IT and electronic tools in connection with the Estate's agricultural, winegrowing and winemaking, commercial, hospitality, experiential and event-related activities, including relationships managed through the website, e-mail, telephone, social networks and booking or payment platforms.

3. Categories of data, purposes and legal bases

Item	Applicable provisions
Data processed	photographic images, audio-video recordings, voice, name, role or testimonial statements, information that can be inferred from the context of the event, and technical file metadata.
Purposes and legal bases	internal documentation and historical archive; corporate communications; publication on the website, social media profiles, brochures, newsletters, press releases and promotional materials. For

	individual portraits or promotional content, the legal basis is normally consent; for panoramic or contextual images and recordings, legitimate interest may apply within the applicable limits.
Social media manager	the social media manager may process content and credentials on behalf of the Estate as a processor pursuant to Article 28 GDPR, on the basis of documented instructions, confidentiality obligations, security measures and rules governing the return or deletion of materials.
Minors	the publication of recognisable images of minors requires specific authorisation from the person exercising parental responsibility, except where the minor is depicted in a non-identifiable and merely contextual manner.
Withdrawal	withdrawal applies to future uses. It does not affect the lawfulness of uses already made and may not make it possible to retrieve materials already printed or shared by third parties on platforms.

Providing the data marked as necessary is essential in order to establish or manage the requested relationship. Failure to provide such data may prevent the preparation of a quotation, the conclusion or performance of the contract, a booking, or compliance with legal obligations. Data requested for optional purposes are processed only where an appropriate legal basis applies.

4. Processing methods and applicable principles

Personal data are processed in accordance with the principles of lawfulness, fairness, transparency, data minimisation, accuracy, storage limitation, integrity and confidentiality. Organisational and technical measures proportionate to the risks are adopted, including management of authorisations, individual credentials, backups, device protection, system updates, logging of relevant events, staff instructions, supplier agreements and incident management procedures.

No solely automated decision-making producing legal effects or similarly significant effects is carried out, unless this is expressly stated in a specific privacy notice. Any commercial segmentation activities do not entail adverse consequences and are carried out in compliance with the consents given and the rights of the data subject.

5. Recipients and authorised persons

Within the limits of their duties and the instructions received, personal data may be accessed by company directors, commercial and administrative staff, winery and hospitality staff, event coordinators and technical staff. Data may also be disclosed to advisers, IT providers, platform operators, banks, insurance companies, carriers, professionals and public authorities where necessary for the purposes described.

Suppliers processing personal data on behalf of the Estate are selected and, where the relevant conditions are met, appointed as processors pursuant to Article 28 GDPR. Other parties, such as banks, social media platforms, photographers or professionals that independently determine the purposes and means of processing, act as independent controllers.

6. Transfers to third countries

The use of cloud services, communication platforms, social networks or providers with international infrastructure may involve transfers of personal data outside the European Economic Area. Such transfers take place on the basis of an adequacy decision or appropriate safeguards, such as Standard Contractual Clauses, supplementary measures and supplier assessments. The data subject may request information on the safeguards applied.

7. Retention periods

Personal data are retained for the periods indicated in the preceding sections and, in any event, no longer than necessary for the relevant purposes, regulatory obligations and the protection of rights. At the end of the retention period, data are erased, anonymised or archived with restricted access where they must be retained to comply with legal obligations or for the establishment, exercise or defence of legal claims.

8. Data subject rights

Item	Applicable provisions
Access	obtain confirmation as to whether personal data are being processed and receive a copy of the data and the information provided for under Article 15 GDPR.
Rectification	obtain correction of inaccurate data and completion of incomplete data.
Erasure	obtain erasure in the cases provided for under Article 17 GDPR, without prejudice to retention obligations or overriding requirements for the establishment, exercise or defence of legal claims.
Restriction	obtain the marking of the data and temporary restriction of processing in the cases provided for under Article 18 GDPR.
Data portability	receive the data provided in a structured format and transmit them to another

	controller where processing is automated and based on consent or contract.
Objection	object at any time to processing based on legitimate interest and, without giving reasons, to direct marketing.
Withdrawal of consent	withdraw consent at any time, without affecting the lawfulness of processing carried out before withdrawal.
Complaint	lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) or bring proceedings before the competent judicial authority.

Requests may be sent to info@ronchidimanzano.com. Before responding to a request, the Data Controller may ask for information necessary to verify the identity of the requester. A response is normally provided within one month, which may be extended in complex cases in accordance with Article 12 GDPR.

9. Security, personal data breaches and updates

In the event of a personal data breach, the Estate applies a procedure for detection, containment, risk analysis and documentation and, where the applicable conditions are met, notification to the supervisory authority and communication to the data subjects concerned. This privacy notice may be updated to reflect organisational, regulatory or technological changes; the current version is made available at data collection points and through the appropriate channels.

10. Acknowledgement and optional consents

Acknowledgement of this privacy notice does not constitute consent and does not require a signature, unless the signature is used solely as evidence that the notice was provided. Consents are requested separately, using specific wording and unticked boxes.

Acknowledgement	I declare that I have received and understood this privacy notice.
Marketing	□ I consent □ I do not consent to receiving promotional communications.
Images and video	□ I consent □ I do not consent to the uses specifically described in the release.
Special categories of data	□ I consent to the processing of data concerning allergies, intolerances or health needs voluntarily disclosed for the safe provision of the service.
Date and signature	_____