

Privacy Policy – Fargo S.p.A.

1. Data Controller

Fargo S.p.A.

Via Monte Sabotino, 2, Bergamo, 24121, Italy

Email: info@fargocommodities.com

Tel: +39 351 705 0107

2. Purpose of Data Processing

Fargo S.p.A. collects and processes personal data submitted through this website strictly for **specific, explicit, and legitimate purposes**, in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and applicable Italian data protection laws.

Personal data provided by users (for example, via contact forms or direct communications) is processed exclusively for the following purposes:

- Responding to inquiries and requests submitted through the website
- Providing information regarding the activities, services, or operations of Fargo S.p.A.
- Managing and facilitating initial communications with prospective clients, partners, or interested parties
- Evaluating potential business relationships on a preliminary, non-binding basis

Personal data shall not be processed for purposes incompatible with those listed above.

Limitations of Processing

This website is not intended to be used, and is not used, for:

- The execution or management of client contracts
- The processing of financial transactions or payments
- The management of client accounts or investment-related activities

Any such activities are conducted exclusively through separate systems, platforms, or formal contractual arrangements outside of this website.

Data Minimization and Purpose Limitation

Fargo S.p.A. adheres to the principles of data minimization and purpose limitation, ensuring that:

- Only personal data strictly necessary for the above purposes is collected
- Data is not retained or used beyond what is required to fulfill such purposes
- No further processing is carried out without a valid legal basis under applicable law

Legal Basis

Processing of personal data through the website is based on:

- The data subject's consent (Article 6(1)(a) GDPR), where applicable
- The need to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) GDPR)

Exclusion of Automated Decision-Making

No automated decision-making or profiling within the meaning of Article 22 GDPR is carried out through this website.

User Acknowledgment

By submitting personal data through this website, users acknowledge and accept that their data will be processed solely for the purposes described above and in accordance with the Privacy Policy.

3. Types of Data Collected

Fargo S.p.A. may collect and process the following categories of personal data voluntarily provided by users through this website:

- Identification data, such as name and surname
- Contact details, including email address and, where provided, telephone number
- Any additional personal data or information that users choose to include within the message or communication field

Users are advised not to submit sensitive personal data (within the meaning of Article 9 of the GDPR), such as data relating to health, biometric data, or other special categories of personal data, unless strictly necessary and appropriately requested.

Voluntary Provision of Data

The provision of personal data through the website is entirely voluntary. However, failure to provide certain information (such as contact details) may prevent Fargo S.p.A. from responding to inquiries or providing the requested information.

Data Minimization

Fargo S.p.A. collects only personal data that is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed, in accordance with Article 5(1)(c) of the GDPR.

User Responsibility

Users are solely responsible for the accuracy and relevance of the personal data they provide and must ensure that any information submitted does not infringe the rights of third parties.

Third-Party Data

Where users provide personal data relating to third parties, they represent and warrant that they have obtained the necessary authorization or consent from such individuals, in accordance with applicable data protection laws.

4. Legal Basis for Processing

Personal data collected through this website is processed in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) on the following legal bases:

- **Consent (Article 6(1)(a) GDPR):**

Where users voluntarily submit their personal data through the contact form or other communication channels, they provide explicit consent to the processing of such data for the purposes described in this Privacy Policy. Users have the right to withdraw their consent at any time, without affecting the lawfulness of processing carried out prior to such withdrawal.

- **Pre-contractual measures (Article 6(1)(b) GDPR):**
Processing is necessary in order to take steps at the request of the data subject prior to entering into a potential contractual relationship, including responding to inquiries, providing requested information, and evaluating potential business interactions.

Scope and Limitations

Processing shall be strictly limited to what is necessary for the purposes described and shall not be extended to unrelated activities without an appropriate legal basis.

Where consent is relied upon, Fargo S.p.A. ensures that such consent is:

- Freely given, specific, informed, and unambiguous
- Collected through appropriate mechanisms (e.g., consent checkboxes)
- Documented and capable of being demonstrated, in accordance with Article 7 GDPR

Withdrawal of Consent

Users may withdraw their consent at any time by contacting Fargo S.p.A. using the details provided in this Privacy Policy. Upon withdrawal, personal data will no longer be processed on the basis of consent, unless another legal basis applies.

No Further Processing

Personal data will not be used for purposes such as marketing, profiling, or automated decision-making without obtaining separate and explicit consent, where required under applicable law.

5. Data Storage and Retention

Personal data collected through this website is processed and stored in a secure manner, in accordance with Regulation (EU) 2016/679 (GDPR) and applicable Italian data protection laws.

Personal data may be stored within:

- Secure email systems used by Fargo S.p.A.

- Internal customer relationship management (CRM) systems and related IT infrastructure
- Hosting environments and service providers that support the operation of the website and communication processes

Appropriate technical and organizational measures are implemented to ensure the confidentiality, integrity, and availability of personal data, including protection against unauthorized access, loss, alteration, or disclosure.

Retention Period

Personal data is retained only for as long as necessary to fulfill the purposes for which it was collected, including responding to user inquiries and managing initial communications.

In particular:

- Data relating to inquiries is retained for the time necessary to process and respond to the request
- Where no further relationship or engagement is established, such data will be deleted or anonymized within a reasonable period, unless retention is required or permitted by applicable law
- Where a business relationship is initiated, data may be retained in accordance with applicable legal, contractual, or regulatory obligations

Legal and Compliance Retention

Fargo S.p.A. may retain personal data for longer periods where necessary to:

- Comply with legal or regulatory obligations
- Establish, exercise, or defend legal claims
- Fulfill record-keeping requirements under applicable laws

Data Deletion and Review

Fargo S.p.A. implements periodic review procedures to ensure that personal data is not retained longer than necessary and is securely deleted or anonymized when no longer required.

Security Measures

All data storage systems are subject to appropriate security controls, including access restrictions, authentication measures, and data protection safeguards proportionate to the nature of the data processed.

6. Data Sharing and Third Parties

Personal data collected through this website may be disclosed, on a need-to-know basis and in accordance with applicable data protection laws, to the following categories of recipients:

- Authorized personnel of Fargo S.p.A., including employees and collaborators who are duly instructed and bound by confidentiality obligations
- IT service providers and technology partners (such as email hosting providers, website hosting providers, and related infrastructure services) acting as data processors on behalf of Fargo S.p.A.
- Internal customer relationship management (CRM) systems and associated service providers used to manage communications and inquiries

All third-party service providers that process personal data on behalf of Fargo S.p.A. are subject to appropriate contractual safeguards, including data processing agreements in accordance with Article 28 of the GDPR, ensuring that such data is processed only on documented instructions and with adequate security measures.

Purpose Limitation

Personal data is shared exclusively for purposes strictly related to:

- Responding to inquiries
- Managing communications
- Ensuring the proper functioning and security of IT systems

No personal data is disclosed for purposes incompatible with those described in this Privacy Policy.

No Sale or Marketing Use

Fargo S.p.A. does not sell, rent, or otherwise disclose personal data to third parties for marketing, advertising, or commercial exploitation purposes.

Legal Disclosure

Personal data may be disclosed to competent authorities, regulatory bodies, or other third parties where required to comply with applicable legal obligations or lawful requests.

Data Protection Safeguards

Fargo S.p.A. ensures that all recipients of personal data implement appropriate technical and organizational measures to protect such data, in accordance with GDPR requirements.

7. International Data Transfers

Where necessary for the purposes described in this Privacy Policy, personal data may be transferred to affiliated entities, partners, or service providers located outside the European Economic Area (EEA), including, where applicable, jurisdictions such as Uganda.

Such transfers are carried out in full compliance with Regulation (EU) 2016/679 (GDPR) and are subject to appropriate safeguards designed to ensure an adequate level of protection for personal data.

In particular, Fargo S.p.A. ensures that at least one of the following mechanisms is in place:

- The use of **Standard Contractual Clauses (SCCs)** approved by the European Commission (Article 46 GDPR)
- Transfers to recipients located in countries deemed to provide an adequate level of data protection by the European Commission (Article 45 GDPR), where applicable
- The implementation of additional technical and organizational measures to safeguard personal data, where required

Risk Awareness

Users are informed that certain countries outside the EEA may not provide the same level of data protection as within the European Union. However, Fargo S.p.A. takes all reasonable steps to ensure that personal data remains protected in accordance with applicable legal standards.

User Rights

Users may request further information regarding the safeguards applied to international data transfers, including a copy of relevant contractual protections, by contacting Fargo S.p.A. using the contact details provided in this Privacy Policy.

Legal Basis for Transfers

Where required, international data transfers may also be based on:

- The explicit consent of the data subject (Article 49(1)(a) GDPR), where applicable
- The necessity of the transfer for pre-contractual measures requested by the data subject (Article 49(1)(b) GDPR)

Fargo S.p.A. remains responsible for ensuring that any international transfer of personal data is carried out in accordance with the principles of lawfulness, fairness, transparency, and security as required under the GDPR.

8. Data Security

Fargo S.p.A. implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk, in accordance with Article 32 of Regulation (EU) 2016/679 (GDPR), in order to protect personal data against unauthorized or unlawful access, disclosure, alteration, loss, or destruction.

Such measures include, where appropriate:

- Access controls and authentication mechanisms to restrict access to authorized personnel only
- Secure storage systems and data handling procedures
- Encryption or pseudonymization of personal data, where applicable
- Regular monitoring, testing, and evaluation of security measures
- Protection against accidental loss, destruction, or damage
- Internal policies and staff training on data protection and confidentiality

Fargo S.p.A. takes into account the nature, scope, context, and purposes of processing, as well as the risks to the rights and freedoms of data subjects, when determining and implementing appropriate security measures.

Data Breach Management

In the event of a personal data breach, Fargo S.p.A. will take appropriate remedial actions and, where required under applicable law, notify the competent supervisory authority and affected data subjects in accordance with Articles 33 and 34 of the GDPR.

Continuous Improvement

Security measures are subject to periodic review and updates to ensure ongoing effectiveness and compliance with evolving legal, technical, and operational requirements.

9. User Rights

In accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR), users (data subjects) have the right to exercise the following rights in relation to their personal data:

- **Right of access (Article 15 GDPR):** to obtain confirmation as to whether personal data is being processed and, if so, to access such data and related information
- **Right to rectification (Article 16 GDPR):** to request the correction of inaccurate or incomplete personal data
- **Right to erasure (“right to be forgotten”) (Article 17 GDPR):** to request the deletion of personal data, subject to applicable legal obligations
- **Right to restriction of processing (Article 18 GDPR):** to request limitation of processing under certain circumstances
- **Right to object (Article 21 GDPR):** to object to the processing of personal data where applicable
- **Right to data portability (Article 20 GDPR):** to receive personal data in a structured, commonly used, and machine-readable format, and to transmit it to another controller where technically feasible

Exercise of Rights

Requests to exercise the above rights may be submitted at any time by contacting Fargo S.p.A. at:

 info@fargocommodities.com

Fargo S.p.A. will respond to such requests without undue delay and, in any event, within one (1) month of receipt, in accordance with Article 12 GDPR. This period may be extended where necessary, taking into account the complexity and number of requests.

Verification and Limitations

Fargo S.p.A. may request additional information to verify the identity of the requester before processing any request, in order to ensure the protection of personal data.

Certain rights may be limited where processing is necessary to comply with legal obligations or to establish, exercise, or defend legal claims, in accordance with applicable law.

Right to Lodge a Complaint

Users also have the right to lodge a complaint with a competent supervisory authority. In Italy, the competent authority is:

Garante per la Protezione dei Dati Personali

(www.garanteprivacy.it)

Fargo S.p.A. is committed to facilitating the exercise of data subject rights in a transparent and accessible manner.

10. Cookies and Tracking

This website uses cookies and similar tracking technologies in accordance with applicable European Union legislation, including the ePrivacy Directive and Regulation (EU) 2016/679 (GDPR).

For detailed information regarding the types of cookies used, their purposes, and how users can manage or withdraw their consent, please refer to our Cookie Policy, which forms an integral part of this Privacy Policy.

Non-essential cookies and tracking technologies are only activated with the user's prior consent, which may be given or withdrawn at any time through the cookie consent mechanism available on the website.

Users are encouraged to review the Cookie Policy to understand how their data may be collected and processed through such technologies.

11. Updates to this Policy

We reserve the right to update this policy at any time. Changes will be published on this page.

Last updated: 30/03/2026