

PRIVACY POLICY FOR THE VIRTUAL ASSISTANT SERVICE (CHATBOT)

This information notice, provided pursuant to Regulation (EU) 2016/679 (GDPR), describes how personal data of users interacting with the virtual assistant (hereinafter "Chatbot") available on the institutional website and the e-shop of the Consorzio del Formaggio Parmigiano Reggiano is processed.

1. Data Controllers

The processing of personal data is carried out by different independent controllers, depending on the area of the site where the user is browsing and the nature of the requests made to the Chatbot:

- **Consorzio del Formaggio Parmigiano Reggiano** (hereinafter "Consorzio")
 - **Address:** Via Kennedy 18 – 42124 Reggio Emilia
 - **Contacts:** privacy@parmigianoreggiano.it; Customer Service: CUSTOMERSERVICE@PARMIGIANOREGGIANO.IT
 - **Data Protection Officer (DPO):** dpo@parmigianoreggiano.it
- **Calicantus s.r.l.** (in its capacity as seller within the e-shop) (hereinafter "Seller")
 - **Address:** Via Luigi Mazzon 28-30, 30020 Quarto D'Altino (VE)
 - **Contacts:** privacy@calicant.us
 - **Data Protection Officer (DPO):** nicola.ghinello@dpo-rpd.com

The Consorzio is an independent controller for processing carried out via the Chatbot on the institutional website and for purposes related to registration, navigation, and pre-sales assistance on the e-shop. The Seller is an independent controller for processing related to the management of purchases and post-sales assistance (e.g., order status, withdrawal, legal guarantee).

2. Data Processor

The Chatbot service is provided by **Heres S.r.l.**, acting as Data Processor pursuant to Art. 28 of the GDPR, based on a specific agreement governing its obligations and responsibilities.

3. Purposes and Legal Basis of Processing

Your personal data will be processed for the following purposes:

Purpose	Controller	Legal Basis (Art. 6 GDPR)
Provision of the Virtual Assistant service to provide	Consorzio	Performance of a service requested by the data

Purpose	Controller	Legal Basis (Art. 6 GDPR)
information on products, dairies, and navigation support.		subject (point b).
Management of requests related to the e-shop (e.g., information on products for sale, registration support).	Consorzio	Performance of pre-contractual and contractual measures (point b).
Management of post-sales requests (e.g., order status, exercise of the right of withdrawal or legal guarantee), via the opening of a support ticket.	Seller	Performance of the purchase contract (point b) and fulfillment of legal obligations (point c).
Technical monitoring, logging, and production of aggregate statistics to ensure security, quality, and improvement of the service.	Consorzio	Legitimate interest of the controller in the correct functioning and improvement of the service (point f).
Evaluation of the service offered to the user.	Consorzio	Legitimate interest of the controller in improving the service (point f).

4. Logic of the Artificial Intelligence System, Methods and Safeguards of Processing

The Virtual Assistant is a Generative Artificial Intelligence system, classified as limited risk under Regulation (EU) 2024/1689 (AI Act).

- **Operating Logic:** The Chatbot generates responses through Natural Language Processing (LLM), dynamically based on the context of the conversation and the knowledge base provided by the Consorzio. Responses are not pre-programmed but created in real-time to answer your specific request.
- **System Limits:** By its nature, the system could generate inaccurate, incomplete, or outdated responses. The information provided does not constitute professional advice. The user is invited not to enter personal data that is not strictly necessary and not to share special categories of data (ex Art. 9 GDPR, e.g., health-related data).
- **No Algorithm Training:** Personal data processed via the Chatbot is not used to train, optimize, or refine the artificial intelligence model used, nor third-party models.

- **Human Oversight:** The system operates under constant human supervision. Interactions may be subject to review for quality and security purposes.
- **Minimization and Pseudonymization:** Voluntarily provided personal data is subject to pseudonymization techniques before being processed by some language processing components.

5. Categories of Processed Data

The Chatbot processes the following categories of data:

- Content of conversations.
- Data provided voluntarily (e.g., name, e-mail, order number).
- Conversational metadata (e.g., timestamp, session duration).
- User identifiers (Session ID or User ID).
- Technical device data (Truncated IP address, user agent).

6. Communication of Data (Recipients)

Data may be communicated to:

- Internal staff and/or collaborators of the Controllers.
- Heres S.r.l. (Data Processor).
- Technological sub-processors (Amazon Web Services EMEA SARL, Datadog, Inc., OpenRouter, Inc., OpenAI OpCo LLC).
- Public authorities, where provided by law.

7. Data Transfer Outside the European Economic Area

The use of the Chatbot involves the transfer of data to the United States. Such transfer is legitimized by the relevant adequacy decision and the adoption of Standard Contractual Clauses (SCCs).

8. Retention Period

The retention period depends on the specific purpose (order management, assistance, etc.). Pseudonymized data for statistical analysis and technical monitoring purposes will be kept for a maximum period of 18 months from collection.

9. Rights of the Data Subject

The data subject has the right to access, rectify, or delete their personal data, as well as the right to restrict or object to its processing, as provided by the GDPR.

10. Reference to Full Information Notices

For a complete review of the processing activities carried out, please refer to the general privacy notices, which the user is encouraged to consult:

- [The Privacy Policy of the Consortium's institutional website](#)