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The EU approves delaying the application of amendments to the rules on the Classification, Labelling and Packaging of chemical substances and mixtures

By Tobias Dolle, Stella Nalwoga, and Paolo R. Vergano

On 17 November 2025, the Council of the EU adopted a *Regulation amending Regulation (EU) 2024/2865 as regards dates of application and transitional provisions*, which foresees to delay the dates of entry into application of several amendments to the EU's *Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures* (hereinafter, *CLP Regulation*). The amendments concern, *inter alia*, the rules on the formatting of labels and the information requirements for advertisements and distance sales, whose application would now be postponed until 1 January 2028. The proposed Regulation is part of the Commission's '*Omnibus VI*' package, which aims at simplifying "*certain provisions in three major pieces of EU chemical legislation*".

This article provides an overview of the '*Omnibus VI*' package, particularly the proposed changes to the *CLP Regulation*, and discusses the proposed changes in the context of the EU's obligations under the rules of the World Trade Organization (hereinafter, WTO) and the impact on businesses.

Enhancing the EU's competitiveness

In January 2025, the European Commission (hereinafter, Commission) had presented its *Competitiveness Compass for the EU*, "*a new roadmap to restore Europe's dynamism*" and intended to boost the EU's economic growth. The *Competitiveness Compass* identified the removal of barriers in the EU Single Market as a key objective. That objective was further developed in the Commission's May 2025 Communication on '*The Single Market: a strategy for making the Single Market simple, seamless and strong*', which emphasised the preference for labelling rules that would "*balance the need to be clearly understood by consumers with the need to reduce market barriers and burden for industry*". According to the Commission, stakeholder views on the EU's *Cosmetics Products Regulation*, the EU's *Fertilising Products Regulation*, and the EU's *CLP Regulation*, *inter alia*, pointed to an excessive administrative burden and associated costs for business. Consequently, on 8 July 2025, the Commission

adopted its ‘*Omnibus VI*’ package, which aims at simplifying rules in the field of chemical products “*while maintaining a high level of protection for consumers and the environment*”.

Overview of the ‘*Omnibus VI*’ package

The Commission’s approach under the ‘*Omnibus VI*’ package was to propose at once targeted amendments to multiple, but related, EU legal instruments. More specifically, the ‘*Omnibus VI*’ package, published by the Commission on 8 July 2025, contains two legislative proposals: 1) A *Proposal for a Regulation of the European Parliament and of the Council as regards simplification of certain requirements and procedures for chemical products*, which intends to simplify “*certain provisions related to the classification, packaging, and labelling of chemicals, cosmetics products and fertilising products*”; and 2) A *proposal* to amend the revised *CLP Regulation* as regards the “*dates of application and transitional provisions*”.

In 2024, the *CLP Regulation* was revised, amending certain rules on the formatting of labels, deadlines for relabelling in case of changes in classification, and information requirements for advertisements and distance sales offers. Under the transitional provisions, the amendments were to enter into application on 1 July 2026 for certain chemical products and on 1 January 2027 for others. These deadlines were considered a “*significant burden to the industry and companies*” and caused important concerns for affected companies, which struggled to meet the deadlines due to the complexity of relevant recalculations and operational constraints. Therefore, the Commission proposed to postpone all dates of application to 1 January 2028.

On 23 October 2025, the European Parliament had approved the Regulation without any amendment to the Commission’s Proposal, and the Council followed suit to clarify the situation for businesses as quickly as possible. The Council of the EU also noted that the postponement not only “*provides more time and legal certainty to businesses*”, but also “*gives more time to the co-legislators to agree on the other substantive changes*” to the *CLP Regulation* contained in the “*Omnibus VI*” package.

The Commission’s proposal to simplify the *CLP Regulation*

In the second part of the “*Omnibus VI*” package, the Commission proposes more substantive changes to the *CLP Regulation*. The Commission explains that the two focal issues of the simplification concern the new mandatory formatting rules for labels, as well as the revised rules on advertisement. Article 31 of the revised *CLP Regulation* introduced new mandatory formatting rules for labels, including prescribed font sizes, line spacing, and the requirement for black text on a white background. The Commission seeks to replace that provision with a more simple requirement for label elements to be “*clearly and indelibly marked*” and for them to “*stand out clearly from the background*” and to “*be of such a size and be spaced in such a way as to be easily read*”.

Article 48 of the revised *CLP Regulation* requires any advertisement to the general public for covered chemical products to indicate the hazard pictograms, signal words, hazard statements, and supplemental statements, and, in addition, to invite consumers to “*Always follow the information on the product label*”. The Commission proposes to eliminate the requirement for hazard pictograms, signal words, hazard statements and supplemental statements and instead require advertisements to only “*include the sentence: ‘Always read the label and product information before use’*”.

Labelling requirements are technical regulations and should not restrict trade

The mandatory labelling requirements under the *CLP Regulation* have important implications for businesses. Rules prescribing requirements as to the presentation of goods, such as mandatory labelling requirements, are considered “*technical regulations*” within the meaning of the WTO Agreement on Technical Barriers to Trade (TBT Agreement). Article 2.2 of the TBT Agreement requires WTO Members to ensure that technical regulations “*are not prepared, adopted or applied with a view to or with the effect of creating unnecessary obstacles to*

international trade". Article 2.4 of the TBT Agreement obliges WTO Members to use relevant international standards, guides or recommendations as a basis for their measures, wherever possible. Stakeholders argued that the mandatory formatting rules for labels under the revised *CLP Regulation* created a mismatch with international rules, "*as the font size used for safety and other instructions, pictograms and net weight*" must also conform to the *ISO international standards*, which provide principles for legibility and methods for determining the minimum font size, rather than specifying a single universal size.

This means that companies supplying chemical products both within and outside the EU must either accommodate different font sizes on one label, potentially "*causing conflicts for available space*", or create labels specifically for the products they intend to supply on the EU market. This conflict with internationally harmonised standards could create unnecessary obstacles to trade. In the event that WTO Members were to challenge the measure at the WTO and establish a *prima facie* case of non-compliance with the TBT Agreement, the EU would, *inter alia*, have to demonstrate that the labelling requirements are not "*more trade-restrictive than necessary to fulfil a legitimate objective*". Such legitimate objectives include, *inter alia*, be the protection of human health or safety.

In December 2024, the German chemical industry association *Verband der Chemischen Industrie*, had [warned](#) that the minimum font sizes and further requirements under the revised *CLP Regulation* would lead to "*various technical, operational, and practical challenges as well as additional costs*" and would also impose a requirement for "*partly reorganising company-internal production and logistics*".

Against this backdrop, the Commission's proposed amendments appear to address the identified operational burdens and potential unnecessary obstacles to extra-EU trade, while ensuring that the *CLP Regulation* continues to meet the EU's legitimate objectives of "*maintaining a high level of protection for consumers and the environment*".

Outlook

Following its adoption by the EU's co-legislators, the proposed Regulation on the postponement of the dates of application and transitional provisions of the revised *CLP Regulation* will now be published in the Official Journal of the EU and enter into force on the twentieth day after its publication. Interested stakeholders should continue following developments on the substantive changes to the *CLP Regulation* proposed by the Commission as part of the '*Omnibus VI*' package on chemicals and ensure that their concerns and interests are heard and reflected in the final text.

For any additional information or legal advice on this matter, please contact Paolo R. Vergano

Thailand's Cabinet approves a draft Ministerial Regulation on the registration of Geographical Indications (GIs) under international agreements

By Joanna Christy, Pattranit Chantaplaboon, and Paolo R. Vergano

On 11 November 2025, the Director General of the Department of Intellectual Property within Thailand's Ministry of Commerce, [Auramon Supthaweethum](#), [announced](#) that Thailand's Cabinet had approved, in principle, the *Draft Ministerial Regulation on Application for Registration of Foreign Geographical Indications under International Agreements*, which is currently under review by the Office of the Council of State. The *Draft Ministerial Regulation* aims at streamlining the criteria and procedures for registering foreign Geographical Indications (hereinafter, GIs), that are listed in international agreements to which Thailand is a party and that require formal applications for registration in Thailand.

This article provides an overview of Thailand's framework on the registration and protection of foreign GIs, outlines the key elements of the *Draft Ministerial Regulation*, and highlights the implications for businesses.

Thailand's framework for the registration and protection of foreign GIs

A GI is a type of intellectual property right that consists of a label used on certain products that have a specific geographical origin and that possess certain qualities or a reputation linked solely to that specific origin. Products benefitting from a GI are subject to particular legal protection, including the exclusive right to use the name, protection against misuse or imitation, and access to civil, and in some cases, criminal remedies to enforce these rights.

In Thailand, the registration for GIs is governed by *Ministerial Regulation Prescribing Rules and Procedures Relating to Application for Registration, Advertisement, Opposition and Counter-Opposition, Registration, Appeal, and Amendment or Withdrawal of Geographical Indication Registration, B.E. 2547 (2004)* (hereinafter, GI Ministerial Regulation). Under the *GI Ministerial Regulation*, GI protection requires registration, which entails submitting an application with supporting documents (e.g., copies of identification cards, passports, corporate certificates, or powers of attorney) to the Ministry of Commerce's Department of Intellectual Property, either in person or electronically through the *e-Filing system*.

A business seeking the protection of a foreign GI in Thailand must provide "*explicit*" evidence showing that the product is protected under the laws of its country of origin. Following the request for registration, the competent official will examine it and inform the applicant of the outcome. However, there is currently no specific legal framework governing the procedures for the registration of Thai and foreign GIs listed in international agreements to which Thailand is a party. The *Draft Ministerial Regulation* is intended to fill this gap.

Preparing for the implementation of commitments under the future Thailand-EU FTA

The *Draft Ministerial Regulation* was prepared in relation to Thailand's ongoing negotiations for a Free Trade Agreement (hereinafter, FTA) with the EU, which both sides aim to conclude in 2026. Both Thailand and the EU seek to protect their respective GIs under the *EU-Thailand FTA*. The Department of Intellectual Property notes that the EU requested "*to include a reciprocal protection of geographical indication by means of exchanging a list of geographical indications' products with Thailand under the FTA*". The issuance of the *Draft Ministerial Regulation* appears to reflect Thailand's commitment to anticipate the future rules of the Thailand-EU FTA.

Thailand's new registration framework for foreign GIs under international agreements

The *Draft Ministerial Regulation* introduces a simplified and fee-exempted procedure for foreign GIs listed under relevant international agreements to be registered in Thailand. Foreign businesses whose GI-protected products are listed in an "*international agreements*" will have to follow the registration requirements and procedures under the *Draft Ministerial Regulation*. Clause 5 of the *Draft Ministerial Regulation* provides that "*international agreements*" include any "*agreement between Thailand and another negotiating party*" that implements "*the protection of GIs of Thailand and the negotiating party through the mutual exchange of GI registration lists*", such as the anticipated *Thailand-EU FTA*, or any agreement with GI lists already in force. The fact that the *Draft Ministerial Regulation* also refers to agreements still under negotiation is intended to allow the Thai Department of Intellectual Property to process and verify GI lists in advance and to avoid delays.

The *Draft Ministerial Regulation* provides for the procedures for submitting GI applications, as well as the steps for publication and acceptance of registrations, appeals, and for the notification that a GI has been registered by Thailand's Department of Intellectual Property. With respect to the registration of a foreign GI, applicants from Thailand's trading partners must submit their application forms, either in Thai or English, containing the required information,

such as evidence demonstrating the direct and verifiable causal link between the product's unique characteristics and its defined geographical origin, to the Government authority of the country of origin. The competent authority in the GI applicant's country would then transmit the application to Thailand's Department of Intellectual Property via the designated electronic system or by e-mail. Foreign GIs would receive legal protection once the registration has been confirmed, which would become effective through a notification and once the international agreement takes effect in Thailand. In case the negotiations for the relevant agreement were to fail, the applications submitted from such negotiating countries would automatically be considered as withdrawn.

Implications for businesses

The procedures foreseen under the *Draft Ministerial Regulation* mark an important departure from Thailand's current regime. Notably, the *Draft Ministerial Regulation* would reduce the administrative burden for foreign businesses and producers, as foreign GI owners would be able to submit their GI application in their home country, would not need to submit supporting documents (e.g., copies of business certificates), and would be exempt from application fees. If enacted, this would provide businesses with a secure, low-cost path to obtain GI protection in Thailand.

Similarly, Thai businesses would be able to seek GI protection in partner countries and would be able to submit the relevant application and supporting documents to Thailand's Department of Intellectual Property, as the competent national authority. The registration procedure under the *Draft Ministerial Regulation* is in line with the [EU's registration procedure](#), where non-EU producers can either submit their application directly to the European Commission or via their national authorities, which then forward it to the Commission.

Overall, it appears that the *Draft Ministerial Regulation* is a positive step to make GI registration in Thailand more efficient, cost-effective, and reciprocal, ultimately strengthening Thailand's cooperation with key trading partners and facilitating the procedures for businesses. Foreign businesses trading in GI-protected specialty products should closely monitor developments, as the *Draft Ministerial Regulation* is currently still under review by Thailand's Office of the Council of State.

For any additional information or legal advice on this matter, please contact Paolo R. Vergano

The Court of Justice of the European Union declares inadmissible the sale of a drink named 'Virgin Gin Alcohol Free'

By Amanda Carlota, Ignacio Carreño García, and Tobias Dolle

On 13 November 2025, the Court of Justice of the European Union (hereinafter, CJEU) ruled in Case C-563/24, *Verband Sozialer Wettbewerb eV v PB Vi Goods GmbH*, that non-alcoholic beverages may not be sold as 'gin', as that name is reserved for a specific alcoholic beverage.

This article provides a brief summary of the case and an overview of the EU rules on the definition, description, presentation, and labelling of spirit drinks. The article discusses the potential impact of the ruling on the EU's fast-growing alcohol-free beverages industry and forthcoming EU rules on low/no alcohol wine.

Under EU law, if a drink does not contain alcohol, it may not be sold as 'gin'

The starting point of the case was an action for injunctive relief brought by the German association combating unfair competition, *Verband Sozialer Wettbewerb*, on 31 October 2023, against a company called *PB Vi Goods* before the Potsdam Regional Court (*Landgericht Potsdam*) for an order that the defendant cease offering a beverage named 'Virgin Gin Alcoholfrei' (Virgin Gin Alcohol Free) for sale. *PB Vi Goods* argued that it was obvious from the

name that it was selling a non-alcoholic drink. The Regional Court considered that the name “*eliminates the risk of misleading the consumer*”, but referred the case to the CJEU, which has now provided a clear answer: A non-alcoholic drink may not be labelled as ‘gin’.

The first paragraph of Article 10(7) of *Regulation (EU) 2019/787 of the European Parliament and of the Council on the definition, description, presentation and labelling of spirit drinks, the use of the names of spirit drinks in the presentation and labelling of other foodstuffs, the protection of geographical indications for spirit drinks, the use of ethyl alcohol and distillates of agricultural origin in alcoholic beverages* provides, in relevant part, that “*the use of the legal names (...) or geographical indications in the description, presentation or labelling of any beverage not complying with the requirements of the relevant category set out in Annex I or of the relevant geographical indication shall be prohibited. That prohibition shall also apply where such legal names or geographical indications are used in conjunction with words or phrases such as “like”, “type”, “style”, “made”, “flavour” or any other similar terms*”.

Annex I to *Regulation (EU) 2019/787* provides ‘*Categories of spirit drinks*’ and Point 20 of that Annex on ‘*Gin*’ provides that only spirit drinks based on ethyl alcohol flavoured by juniper berries with a minimum alcoholic strength by volume (ABV) of 37.5% may be named ‘gin’. Notably, it states that: “(a) *Gin is a juniper-flavoured spirit drink produced by flavouring ethyl alcohol of agricultural origin with juniper berries (Juniperus communis L.). (b) The minimum alcoholic strength by volume of gin shall be 37.5%. (c) Only flavouring substances or flavouring preparations or both shall be used for the production of gin so that the taste is predominantly that of juniper. (d) The term “gin” may be supplemented by the term “dry” if it does not contain added sweetening exceeding [0.1] grams of sweetening products per litre of the final product, expressed as invert sugar*”.

The CJEU held that there is a clear prohibition in EU law on presenting and labelling a beverage such as ‘*Virgin Gin Alkoholfrei*’ as ‘*non-alcoholic gin*’, precisely because the beverage does not contain alcohol. According to the court, the fact that the legal name ‘gin’ is accompanied by the term ‘*non-alcoholic*’ is irrelevant. The court also held that the prohibition does not impair the freedom to conduct a business enshrined in Article 16 of the *Charter of Fundamental Rights of the EU*, as it prohibits only the use of the legal name ‘gin’ for non-alcoholic beverages, without hindering the production or distribution of such beverages.

The CJEU considered the prohibition proportionate, as it “*guarantees consumers that those products all meet the same quality standards and protects them against any risk of confusion as to the composition of the products which they intend to purchase*” and “*makes it possible to prevent a producer of a beverage that does not comply with the requirements laid down in Regulation 2019/787 from being able to take advantage, for its own product, of the reputation acquired by producers of spirit drinks covered by a legal name*”. The judgement provides legal certainty with respect to the names that may be used for non-alcoholic spirits.

Potential impact on the fast-growing alcohol-free drinks industry

The CJEU’s judgement that a non-alcoholic beverage may not be marketed with a name containing the term ‘gin’ could have wide-ranging consequences for a growing sector providing non-alcoholic beverages to more health-conscious consumers. The value of the non-alcoholic spirits market in Europe was estimated at around EUR 123 million in 2023 and at EUR 130 million in 2024. Worldwide, the non-alcoholic spirits market is expected to grow by 8.35% between 2025 and 2032.

According to the *Organisation for Economic Co-operation and Development (OECD)*, the average alcohol consumption in the EU saw a modest decline of 0.3 litres (-3%) between 2010 and 2022. As alcohol consumption has declined across the EU over the past decade, non-alcoholic alternatives cease to be a niche product and there is a zero percent alcohol version of many alcoholic beverages, such as wine, sparkling wine, and spirits. In view of the prohibition to use ‘gin’ for a non-alcoholic version, more generally, the prohibition of Article 10(7) of *Regulation (EU) 2019/787* covers the “*use of the legal names (...) or geographical*

indications in the description, presentation or labelling of any beverage not complying with the requirements of the relevant category set out in Annex I or of the relevant geographical indication”.

Importantly, Annex I of *Regulation (EU) 2019/787* lists 44 different categories of spirit drinks that are similarly protected than gin, including rum, whisky, grain spirit, brandy, vodka, pastis, liqueur, and sambuca. The prohibition in Article 10(7) of *Regulation (EU) 2019/787* also applies to the 265 geographical indications of spirit drinks that are registered in the EU’s *Register of geographical indications of spirit drinks* under Article 33 of *Regulation (EU) 2019/787*, such as *Cassis de Dijon*, *grappa*, and *ouzo*.

In another case in Germany, in a [judgment](#) of 24 July 2025, the Regional Court of Hamburg (*Landgericht Hamburg*) ruled that there was an anti-competitive violation of Article 10(7) of *Regulation (EU) 2019/787* by product designations ‘*This is not Rum*’, ‘*This is not Gin*’, and ‘*This is not Whiskey*’ for non-alcoholic beverages.

Forthcoming EU rules on low/no alcohol wine

The wine industry has also increasingly explored the market for reduced-alcohol and alcohol-free products and has already taken steps to avoid facing similar legal challenges. The European wine business association CEEV had already asked the European Commission (hereinafter, Commission) to establish a legal framework for these products back in 2021. On 28 March 2025, the European Commission presented its *Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EU) No 1308/2013, (EU) 2021/2115 and (EU) No 251/2014 as regards certain market rules and sectoral support measures in the wine sector and for aromatised wine products*.

The purpose of this future Regulation is to support the EU’s struggling wine sector, which faces multiple challenges, such as declining consumption, changing consumer preferences, climate change, geopolitical tensions, and uncertain export markets. Notably, the Commission acknowledges the increasing popularity of “*no/low-alcohol*” wines and aims at harmonising the labelling of such wines to make it easier for consumers seeking alternatives to traditional wines with higher alcohol content (see *Trade Perspectives*, Issue No. 7 of 7 April 2025).

The Commission proposes more informative labels, with clear terms to inform consumers, such as ‘*alcohol-free*’ for drinks containing up to 0.5% alcohol, and ‘*alcohol-light*’ for wines with a small alcohol content. The Commission’s Proposal is still being examined by the EU’s co-legislators and, reportedly, there are diverging opinions on the terminology, with some favouring ‘*reduced-alcohol*’, and others preferring ‘*low-alcohol*’.

Outlook

The judgement of the CJEU in Case C-563/24 puts the ‘*ball back in the court*’ of the Potsdam Regional Court: The Court must now decide the case, taking into account the CJEU’s requirements. Stakeholders in the non-alcoholic and in the alcoholic beverages industries should monitor developments and may need to consider alternative product names and marketing strategies.

For any additional information or legal advice on this matter, please contact Ignacio Carreño Garcia

Recently adopted EU legislation

Trade Law

- *Decision No 1/2025 of the Joint Committee established by the Agreement between the European Union and the Republic of Moldova on the Carriage of*

Freight by Road of 19 September 2025 as regards the continuation of the Agreement [2025/2252]

- *Council Decision (EU) 2025/2381 of 13 November 2025 authorising the opening of negotiations to amend the International Agreement on Olive Oil and Table Olives, 2015*
- *Commission Delegated Regulation (EU) 2025/2003 of 8 September 2025 amending Regulation (EU) 2021/821 of the European Parliament and of the Council as regards the list of dual-use items*

Trade Remedies

- *Commission Implementing Regulation (EU) 2025/2328 of 24 November 2025 amending Implementing Regulation (EU) 2021/328 imposing a definitive countervailing duty on imports of certain continuous glass fibre products originating in the People's Republic of China following a partial interim review, limited to injury*
- *Commission Implementing Regulation (EU) 2025/2337 of 24 November 2025 amending Implementing Regulation (EU) 2023/1452 imposing a definitive anti-dumping duty on imports of certain continuous filament glass fibre products originating in the People's Republic of China*
- *Commission Implementing Regulation (EU) 2025/2333 of 19 November 2025 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of hardwood plywood originating in the People's Republic of China*
- *Commission Implementing Regulation (EU) 2025/2320 of 18 November 2025 amending Implementing Regulation (EU) 2021/633 imposing a definitive anti-dumping duty on imports of monosodium glutamate originating in the People's Republic of China and in Indonesia following an expiry review pursuant to Article 11(2) of Regulation (EU) 2016/1036 of the European Parliament and of the Council*
- *Commission Implementing Regulation (EU) 2025/2351 of 18 November 2025 imposing a definitive safeguard measure with regard to imports of certain ferro-alloying elements*
- *Commission Implementing Regulation (EU) 2025/2314 of 17 November 2025 imposing a provisional anti-dumping duty on imports of phosphorous acid originating in the People's Republic of China*

Customs Law

- *Commission Implementing Regulation (EU) 2025/2380 of 18 November 2025 concerning the classification of certain goods in the Combined Nomenclature*

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