

## **Customer Privacy Information**

**INFORMATION PURSUANT TO ART. 13, LEGISLATIVE DECREE 30.6.2003 NO. 196 (Personal Data Protection Code) and ART. 13 GDPR 679/2016 (European Regulation on the protection of personal data)**

Dear Customer, this information is provided to customers that are natural persons and to natural persons operating in the name and on behalf of customers that are legal entities, pursuant to art. 13 of Legislative Decree 196/2003 (Personal Data Protection Code) and art.13 GDPR 679/2016 (European Regulation on the protection of personal data).

### **Data Controller**

ELETTRODOTTI CANTAMESSA & CO. S.P.A – Via Tonale Mendola, 60 – 24060 Endine Gaiano (BG) (Italy)

Email address of the Data Controller: [privacy@elettrodotticantamessa.it](mailto:privacy@elettrodotticantamessa.it)

### **1. Types of Data collected**

The Personal Data collected by the Data Controller, independently or through third parties, include: Name, Surname, Company Name, Telephone, Country, Province, Email, Postal Code, City, VAT number, Tax Code, various types of Data.

### **2. Method and place of processing of the Data collected**

#### **Processing method**

The Data Controller processes the Personal Data of the Interested Party by adopting the appropriate security measures, in order to prevent unauthorized access, disclosure, modification, or destruction of Personal Data.

The data processing is carried out using IT and / or telematic tools, with organizational methods and with logics strictly related to the purposes indicated. In some cases, in addition to the data Controller, the personnel involved in the data Controller organization may have access to the data (administrative, commercial and marketing staff, lawyers, system administrators), or external operators (such as third party service providers, couriers, IT companies, communication agencies, agents and representatives, banks and financial institutions, debt collection and credit insurance Companies). Sometimes, if necessary, they can be appointed as Data Processors by the Data Controller. The updated list of Data Processors can always be requested from the data Controller.

### **Legal basis for data processing**

The data Controller processes Personal Data relating to the Interested Party if one of the following conditions occurs:

- the Interested Party has given consent for one or more specific purposes. Note: in some systems, the Data Controller may be authorized to process personal data without requiring the consent of the Interested Party or without the existence of another of the legal bases specified below, until the Interested Party objects ("opt-out") to such processing. However, this does not apply if the processing of Personal Data is regulated by European legislation on the protection of Personal Data;
- the processing is necessary for the execution of a contract with the Interested Party and/or for the execution of pre-contractual measures;
- the processing is necessary to fulfill a legal obligation to which the Data Controller is subject;

- the processing is necessary for the execution of a public interest task or for the exercise of public powers with which the Data Controller is invested;
- the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties.

In any case, it is always possible to ask the Data Controller for the concrete legal basis of each data processing and in particular to specify whether the data processing is based on the law, envisaged by a contract, or necessary to conclude a contract.

## **Place**

The Data are processed at the Data Controller's operating offices and in any other place where the parties involved in the processing are located. For further information, contact the Data Controller.

The Personal Data of the Interested Party may be transferred to a country other than that in which the Interested Party is located. To obtain further information on the place of data processing, the Interested Party can refer to the section relating to the details of the processing of Personal Data.

The Interested party has the right to obtain information regarding the legal basis for the transfer of data outside the European Union or at an international organization under public international law or consisting of two or more countries, such as the UN, and also regarding the security measures adopted by the Data Controller to protect Data.

If one of the transfers described above takes place, the Interested Party can refer to the respective sections of this document or request information by contacting the Data Controller at the details shown at the beginning.

## **Duration**

The Data are processed and stored for the time required by the purposes for which they were collected.

Therefore:

- Personal Data collected for the purposes related to the execution of a contract between the Data Controller and the Interested Party will be retained until the execution of this contract is completed.
- Personal Data collected for purposes attributable to the legitimate interest of the Data Controller will be retained until this interest is satisfied. The Interested Party can obtain further information regarding the legitimate interest pursued by the Data Controller in the relevant sections of this document or by contacting the Data Controller.

When the data processing is based on the consent of the Interested Party, the Data Controller can keep the Personal Data longer, until such consent is revoked. Furthermore, the Data Controller may be obliged to keep Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, Personal Data will be deleted. Therefore, at the expiration of that period, the right to access, cancellation, rectification and the right to data portability will no longer be exercised.

### **3. Purposes of the Processing of the Data collected**

The data of the Interested Party are collected to allow the Data Controller to provide its services, as well as for the following purposes:

- a) Requirements deriving from a correct fulfillment of the contractual obligations connected with the issue of orders and invoices, shipment of the items and of all the operations that are deemed necessary for the successful outcome of the commercial transactions.
- b) Fulfillment of legal obligations related to civil, fiscal and accounting regulations.
- c) Use of data for statistical-comparative research for internal use only.
- d) The management of promotional and marketing activities such as: the sending of advertising material, commercial and marketing information relating to the products and services that the Data Controller already provides to the Interested Party, both in paper and electronic form.

To obtain further detailed information on the purposes of the processing and on the Personal Data concretely relevant for each purpose, the Interested Party can refer to the relevant sections of this document.

### **4. Rights of Users**

The Interested Parties can exercise certain rights with reference to the Data processed by the Data Controller pursuant to art. 7 of Legislative Decree 196/03 and in accordance with articles 15 right of access, 16 right to rectification, 17 right to cancellation, 18 right to limitation of processing, 20 right to portability, 21 right

to object and 22 right to object to the automated decision-making process of the GDPR 679 / 16.

In particular, the Interested Party has the right to:

- **Revoke consent at any time.** The Interested Party can withdraw the consent to the processing of his Personal Data previously expressed.
- **Object to the processing of his Data.** The Interested Party may object to the processing of their data when it takes place on a legal basis other than consent. Further details on the right to object are indicated in the section below.
- **Access his Data.** The Interested Party has the right to obtain information on the Data processed by the Data Controller, on certain aspects of data processing, and to receive a copy of the processed Data.
- **Check and request correction.** The Interested Party can verify the correctness of his data and request its updating or correction.
- **Obtain the limitation of data processing.** When certain conditions are met, the Interested party may request the limitation of the processing of his Data. In this case, the Data Controller will not process the data for any other purpose other than their conservation.
- **Obtain the cancellation or removal of his Personal Data.** When certain conditions are met, the Interested Party can request the cancellation of his Data by the Data Controller.
- **Receive his Data or have them transferred to another data controller.** The Interested Party has the right to receive his data in a structured format, commonly used and readable by an automatic device and, where technically feasible, to obtain the transfer without obstacles to another data controller. This provision is applicable when the data are processed with automated tools and

the processing is based on the consent of the Interested Party, on a contract in which the Interested Party is a party or on contractual measures connected to it.

- **Submit a complaint.** The Interested Party can lodge a complaint with the competent data protection supervisory authority or take legal action.

### **Details on the right to object**

When Personal Data are processed in the public interest, in the exercise of public powers with which the Data Controller is invested, or to pursue a legitimate interest of the Data Controller, Users have the right to oppose the processing for reasons related to their particular situation.

It should be pointed out to the Interested Parties that, if their data were processed for direct marketing purposes, they can oppose the processing without providing any reason.

### **How to exercise your rights**

To exercise the rights, the Interested Parties can send a request to the contact details of the Data Controller indicated in this document. Requests are filed free of charge and processed by the Data Controller as soon as possible.

## **5. Further information on data processing**

### **Defense in court**

The Personal Data of the Interested Party can be used by the Data Controller in court or in the preparatory stages for its eventual establishment for the defense against abuse in the use of this Application or related Services by the Interested Party.

The Interested Party declares to be aware that the Data Controller may be obliged to disclose the Data by order of the public authorities.

### **Information not contained in this policy**

Further information in relation to the processing of Personal Data may be requested at any time to the Data Controller using the contact details.

### **Changes to this privacy policy**

The Data Controller reserves the right to make changes to this privacy policy at any time, giving information to the Interested Parties on this page and, if technically and legally feasible, sending a notification to the Interested Parties through one of the contact details held by the Data Controller. If the changes concern treatments whose legal basis is consent, the Data Controller will collect the Interested Party's consent again, if necessary.

## **6. Definitions and legal references**

### **Personal Data (or Data)**

Any information relating to a natural person identified or identifiable, even indirectly, by means of reference to any other information, including a personal identification number, constitutes personal data.

### **Interested Party**

Natural or legal person to whom the Personal Data refers

### **Responsible for the Data Processing (or Data Processor)**

Natural person, legal person, public administration and any other entity, association or body appointed by the Data Controller to process Personal Data, in accordance with the provisions of this privacy policy.



**Data Processing Holder (or Data Controller)**

Natural person, legal person, public administration and any other entity, association or body, which are responsible, also together with another holder, for decisions regarding the purposes, the methods of processing personal data and the tools used, including the security profile, in relation to the operation and use of this Application. The Data Controller, unless otherwise specified, is the owner of this Application.

**European Union (or EU)**

Unless otherwise specified, any reference to the European Union contained in this document is intended to be extended to all current member states of the European Union and the European Economic Area.

**Legal references**

This privacy information has been prepared on the basis of multiple legislative systems, including articles 13 and 14 of EU Regulation 2016/679.

Endine Gaiano 20/05/2018