

	<b>Privacy Management System</b>	REV 00
	INFORMATION BRIEFING FOR CLIENTS ON THE PROCESSING OF PERSONAL DATA	M_11.0.05

## **Information briefing for Clients in accordance with Article 13, EU Regulation 679/2016**

Officine Tecnosider S.r.l. is committed to the protection of the personal data that are entrusted to it. Therefore, the utmost attention is paid to guaranteeing the management and security of the data, in compliance with the requirements of the aforementioned privacy regulation.

This information briefing explains who we are, the purposes for which we will use your data, how we will manage them and to whom they may be communicated (for example, user companies, Group companies, Public Entities etc.), where they could be transferred and what your rights are.

### **1. Purposes, legal basis and processing method**

The aim of Officine Tecnosider S.r.l. is the protection of its Clients' data, ensuring that their processing is marked by principles of accuracy, legality and transparency. We therefore inform you that your personal data shall be processed through the use of suitable instruments and procedures to ensure their utmost security and confidentiality, in archives and on paper, with the aid of digital media, information and data transmission technologies.

The data processing shall be carried out for purposes connected to the management of the contractual relationship and the fulfilment of the accounting and fiscal obligations, the legal obligations (for example, anti-terrorism controls), money laundering controls, fiscal and accounting checks, dispute management, distribution, support, updating and information regarding the products offered.

As a consequence, the processing is considered lawful in accordance with article 6, paragraph 1, letters b, c and f of the GDPR. Failure to communicate part or all of the data may lead to the objective impossibility of implementing the commercial contract and/or correctly performing all the fulfilments connected to the working relationship between the undersigned Data Manager and the Client.

You are also informed that, in fulfilment of one of the Group's policy, all corporate emails shall be retained through an archiving system managed in outsourcing. Access to archived data can be arranged only by the public authorities, in the cases and by the methods laid down by the current laws, in the event of legal disputes.

Your personal data are not subject to dissemination.

The data shall be processed by the Data Controller in a lawful manner, accurately and with the utmost confidentiality, mainly with electronic and digital instruments, and stored on digital media, paper and, where required, on any other type of medium deemed suitable.

Your personal data shall be stored, starting from when they are received/updated, for a sufficient period for the processing purposes reported above and, in any event, as laid down by:

- a) art. 2948 of the Civil Code, which lays down a period of 5 years for periodic payments
- b) art. 2220 of the Civil Code, which lays down retention for 10 years of accounting records

	<b>Privacy Management System</b>	REV 00
	INFORMATION BRIEFING FOR CLIENTS ON THE PROCESSING OF PERSONAL DATA	M_11.0.05

c) art. 22 of the Presidential Decree of 29 September 1973, no. 600, as regards the mandatory accounting records

in compliance the periods laid down by the law for the type of activity and, in any event, until revocation of consent or until the right of opposition is exercised, in accordance with article 21, EU Regulation 2016/679.

## **2. Subjects to which the personal data may be communicated**

For the purposes of executing the contract, your data may be communicated to Group companies, as well as third-party subjects, including companies that perform technical/administrative services on our behalf, credit recovery companies, user agencies, bilateral sector entities referred to in article 24, paragraph 2, letter h) of the National Collective Labour Contract, supply agencies, professionals, public entities, audit or supervisory bodies, in order to fulfil the obligations deriving from the law, regulations, community rules or for aspects regarding the management and execution of the contractual relationship.

For all the purposes indicated in this information briefing, your data may also be communicated abroad, inside and outside the European Union, in compliance with the rights and guarantees laid down by the current regulations, subject to confirmation that the country in question can guarantee the level of protection defined by the Regulation as "adequate".

The data shall be processed by resources inside the offices of the Group's companies, adequately trained, acting as personnel authorised to process the data.

We will not use your personal data for purposes other than those described in this information briefing, unless we notify you in advance and, where necessary, obtain your consent.

## **3. Rights of the Interested Party**

As the interested party, you have the rights referred to in articles 15-21 of the GDPR and, more specifically, the right to:

- Obtain confirmation of the existence or otherwise of personal information concerning you, even if not yet registered, and communication of the information in intelligible form
- Obtain an indication of:
  - a) The origin of the personal data
  - b) The purposes and methods of the processing
  - c) The logic applied in the case of processing carried out with the assistance of electronic instruments
  - d) The identification details of the data controller, data managers and designated representatives in accordance with article 3, paragraph 1 of the GDPR
  - e) The subjects and categories of subjects to whom the personal data may be communicated or who may become aware of them as designated representatives in the territory of the State, managers or appointees
- Obtain:
  - a) The updating, correction or, when required, the supplementing of the data;

	<b>Privacy Management System</b>	REV 00
	INFORMATION BRIEFING FOR CLIENTS ON THE PROCESSING OF PERSONAL DATA	M_11.0.05

- b) The deletion, conversion into anonymous form or the blockage of data processed in violation of the law, including those for which retention is not necessary for the aims for which the data was collected or subsequently processed
- c) Confirmation that the operations referred to in letters a) and b) have been brought to the attention, including their content, of those to whom the data have been communicated or disseminated, unless this proves impossible or leads to the use of means clearly disproportionate to the protected right
- Object, for legitimate reasons, to the processing of personal data, wholly or in part, that concerns you, even though relevant to the purpose of their collection
- Revoke consent.

Where applicable, you also have the rights referred to in articles 16-21 GDPR (Right of rectification, right to be forgotten, right to limitation on processing, right to the portability of the data, right of opposition).

At any time, you can exercise the rights by sending:

- a recorded delivery letter to Officine Tecnosider Srl, Via Jacopo Linussio, 1 – 33058 S. Giorgio di Nogaro (UD)
- an email to the address [privacy@officinetecnosider.it](mailto:privacy@officinetecnosider.it)
- a certified email to the address [officinetecnosider@legalmail.it](mailto:officinetecnosider@legalmail.it)

You also have the right to make complaints to the Guarantor Authority for the protection of personal data ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

#### **4. Data Controller**

The Data Controller is Officine Tecnosider S.r.l., a single-member company, with registered office in Via Treppo 18, Udine and operational headquarters in Via Jacopo Linussio 1, San Giorgio di Nogaro (UD), registered on the Udine Business Register, Tax Code and VAT No. 02494780303, Email [info@officinetecnosider.it](mailto:info@officinetecnosider.it), in the person of its legal representative.

#### **Amendments to the Privacy Policy**

This document, together with the other technical and operational documents, regulates the methods of processing the personal data provided by Interested Parties, directly or indirectly. The introduction of new regulations in the sector, such as the continuous examination and updating of the services for the user, could lead to the need to change these methods. It is therefore possible that our policy may undergo amendments over time and we therefore suggest that the visitor asks the Data Controller for explanations, by means of a request to the addresses listed, or by visiting the following web page:

<http://www.officinetecnosider.it/privacy.html>

Periodically consult this page. For this purpose, the policy document reports the date it was updated.

	<b>Privacy Management System</b>	REV 00
	INFORMATION BRIEFING FOR CLIENTS ON THE PROCESSING OF PERSONAL DATA	M_11.0.05

The Data Controller's Representative