

**SUBJECT: Information note pursuant to article 13 of Italian Legislative Decree 196/03 and articles 13 and 14 of GDPR EU 2016/679 with regard to the protection of personal data processing.**

In your capacity as "Data Controller" and "Data Subject, that is the subject to which the data under process are referred to and/or are handled, we would like to inform you about the key elements of the processing performed.

**Purpose of processing**

The collection and processing of personal data are carried out in order to:

1. ensure that all operations imposed by regulatory obligations, fiscal and tax rules deriving from the conducting of business, as well as by the requirements concerning anti-money laundering are carried out;
2. establish and execute the ongoing contract relationships, as well as any pre- and after-sales assistance;
3. carry out the operations that are strictly linked and instrumental to establish such relationship, including the acquisition of preliminary information in order to stipulate the Contract;
4. manage the relationship with the Client for administration and accounting tasks, as well as orders, shipments, invoicing, services, handling of any dispute;
5. establish the clients' level of satisfaction, compile statistics for internal use;
6. in particular, send marketing or direct sale information material, perform market or business communication researches, both via automated means (email, other remote communication systems through communication networks, such as, by way of example: SMS, MMS, WhatsApp) and traditional (paper mail) by the Data Controller, in full respect of article 130 of Legislative Decree 196/03 and of the Provision by the Italian Data Protection Authority dated 04/07/2013 ("Guidelines on Marketing and against Spam").

Said data will be processed according to the principles of fairness, lawfulness, transparency and the protection of your privacy and rights.

The intended contract purpose, as well as that of service provision, trade and non-trade dispute and marketing, concerns the processing of the personal data of the Client only. The Client's personal data will be processed for the entire duration of the contract and for the subsequent fulfilment of all legal obligations, as well as for future commercial purposes.

**Anti-money laundering and anti-terrorism**

Data must be provided as established by the regulation on anti-money laundering and anti-terrorism. Failure to provide such data shall preclude the professional service required and shall entail reporting the operation to the competent supervising authority.

As far as this is concerned, it should be pointed out that the processing of personal data in relation to anti-money laundering obligations will be performed by taking into account the specific implementation measures imposed to non-financial operators by the Regulation on the identification and retention of information,

pursuant to art. 3, paragraph 2 of Legislative Decree no. 56/2004 and adopted with Ministerial Decree no. 143/2006. Other information may be taken from public sources in order to fulfil the obligations provided for by Legislative Decree 231/2007.

### **Methods of data processing**

The processing of data for the described purposes is carried out both automatically, using electronic or magnetic media, and manually on paper, in compliance with the confidentiality and security rules required by law, resulting regulations and internal provisions.

### **Place of data processing**

The data are currently processed and filed at the company's registered office at Via E. Fermi, 43/b - 31038 Paese (TV). Furthermore, data is processed on behalf of the writer by professionals and/or companies in charge of technical, development, management and administration-accounting activities.

### **Obligatory or voluntary nature of providing the requested data**

Some data are fundamental in order to establish the contract relationship or for its execution, while other may be defined as ancillary to that purpose. The provision of data to the writer is mandatory only for the data for which a regulatory or contract obligation is involved.

### **Consequences of possible refusal to provide data**

In the cases where providing data is mandatory due to a contract or regulatory obligation, refusal to provide said data could lead the Supplier to not perform or continue the Contract as this would entail illicit processing. In the cases where there is no regulatory obligation to do so, the refusal would not lead to any of the aforementioned consequences but would anyway impede the execution of accessory operations.

### **Communication of data**

Without prejudice to the communications and disclosures in order to fulfil legal obligations, your data as legal entity may be disclosed in Italy and/or abroad to:

- Professionals and consultants, consulting firms, factoring companies, credit institutions, debt collection companies, credit insurance companies, commercial information firms and transport companies;
- Public and private entities, even after inspections or checks, such as: Financial administration, Tax Police Service, Judicial Authorities, Italian Exchange Office, Labour Inspectorate, National Health Authority, Social Security Institutions, ENASARCO, Chamber of Commerce etc.;
- Other companies belonging to the group also with offices abroad (see specific point here below);
- Subjects that may access your data due to law provisions.

Sensitive data, even though processed anonymously, shall not be disclosed and/or transferred, without prejudice to instances exclusively for the achievement of the purposes indicate in this information note and prior to your specific written authorization.

## Transfer of data to a foreign country

Client's data may be communicated to other companies of the Group GALDI Srl, located in non-European countries, only for the fulfilment of the obligations arising from the service contract of which the Client is an interested party or to fulfil specific requests, prior to contract conclusion, or for the conclusion or execution of a contract concluded on its behalf (article 43/b Legislative Decree 196/03).

## Duration of data retention

The data provided will be filed in our archives according to the following parameters:

- For administrative and accounting activities, as well as orders, quoting and production flow management, assistance and maintenance, shipping, invoicing, services, management of any disputes: 10 years as established by law in the provisions of article 2220 of the Civil Code, without prejudice to possible delayed payments of fees justifying extension;
- For the purposes as per aforementioned point 5, data must be retained until the end of the contract and/or of the supply relation;
- For marketing purposes (point 6): 24 months.

## Data subject's rights

With regard to personal data, the Client may exercise the rights established by articles 15 to 22 of GDPR 2016/679 and article 7 of Legislative Decree 196/03 (attached) within the limits and under the conditions established in articles 8, 9 and 10 of the aforementioned legislative decree.

In the event of subscription of any kind of declaration of consent to the processing requested by GALDI SRL please note that the Data Subject may withdraw consent at any time, without prejudice to the obligations set out by current laws upon the request for cancellation, by contacting the Data Controller at the contact information here below.

## Data controller and processor

The data controller you can address to in order to exercise your rights pursuant to articles 15 to 22 of GDPR 2016/679 and article 7 above is GALDI SRL, with registered office at Via E. Fermi, 43/b - 31038 Paese (TV).

The data processor is Andrea Mattiuzzo.

You may also be entitled to exercise said rights by sending communications to the following email address: [info@galdi.it](mailto:info@galdi.it).

Paese, 14 March 2020

**GALDI SRL**