

# **CUSTOMER PRIVACY POLICY**

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DEV/ 2

DATE: 03/05/2018

DESCRIPTION: Adaptation to Regulation EU 679/2016

This policy is being provided pursuant to Arts. 13 and 14 of Regulation EU 679/2016 by **SUBISSATI S.r.l.**, with registered office in 2 Via F.lli Lombardi, 60010 Ostra Vetere (AN), as the Controller, to anyone who visits the company website and fills out the "contacts" form, thus authorising the company to process their personal data.

It is optional to provide the data. If you refuse to provide the data, it will be impossible to process and satisfy your requests.

#### **Purposes of processing**

The personal data provided by users is used solely to process and satisfy their requests, which may also include business requests.

### Legal basis

The personal data provided by users is processed lawfully to take steps prior to entering into a contract or for performance of a contract (Art. 6(1)(b) of Regulation 679/2016), as requested by the users themselves (request sent by filling out the form).

#### **Data recipients**

The personal data provided by users will not be disclosed to third parties in any way. It might be communicated to employees and collaborators of the Controller, who process it in accordance with the instructions of said Controller.

#### **Processor**

If necessary, for activities associated with maintenance of the technological part of the website, the personal data provided might be processed by company employees appointed as processors pursuant to Art. 28 of Regulation EU 679/20016.

#### Data storage

Users' personal data will be processed for the time necessary to achieve the purposes indicated.

## Rights of the data subject

Pursuant to Art. 13(2) and Arts. 15 to 21 of the Regulation, we inform you that you have the following rights with respect to processing of your personal data:

# a) Right of access to the personal data and to the following information:

- confirmation as to whether or not personal data concerning you is being processed;
- the purposes of processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data has been or will be disclosed;
- where the personal data is not collected from the data subject, any available information as to its source;
- the existence of automated decision-making, including profiling; the right to obtain a copy of the personal data processed.
- **b)** Right to rectification and integration of the personal data;
- c) Right to erasure of the data (\*right to be forgotten\*) where one of the following grounds applies:
- the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data has been unlawfully processed;
- the personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

Where the controller has made the personal data public and is obliged to erase the personal data, the controller shall take reasonable steps to inform other controllers which are processing the personal data of the request for the erasure of any links to, or copy or replication of, your personal data.

## d) Right to restriction of processing if:



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- the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead;
- the controller no longer needs the personal data for the purposes of the processing, but it is required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing, pending the verification whether the legitimate grounds of the controller override those of the data subject.
- **e) Right to lodge a complaint** with the Supervisory Authority, following the procedures and the indications published on the official website of the Authority, www.garanteprivacy.it.
- **f) Right to data portability**, i.e. the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller, where processing is based on consent or on a contract and is carried out by automated means. The data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
- **g) Right to object** at any time to processing of personal data concerning him or her, including profiling, particularly when:
- processing is based on the legitimate interest of the controller, following explanation of the reasons for the objection;
- the personal data is processed for direct marketing purposes.
- **h)** Right not to be subject to a decision based solely on **automated processing**, including **profiling**, unless the decision: is necessary for entering into, or performance of, a contract between the data subject and a data controller, is authorised by Union or Member State law to which the controller is subject or is based on the data subject's explicit consent.
- i) Right to withdraw consent at any time; where the processing is not based on another legal basis (including compliance with a legal obligation or performance of a contract), the data must be erased by the controller.

### **COOKIES**

Cookies are small text files which the websites visited by users send to their terminals, where they are stored in order to be retransmitted to those websites on the subsequent visit.

Generally speaking, **SUBISSATI S.r.l.** uses the so-called technical cookies needed to guarantee that the website functions properly. If you wish to disable/refuse use of said cookies, you can do so by altering the browser settings of your PC at any time. If you do, please note that you may have difficulties in browsing the website or using certain contents.

If you want further details on the other types of cookies used by **SUBISSATI S.r.l.**, i.e. the so-called third party and profiling cookies, please consult the <u>cookie policy</u> on the company website www.subissati.it

There are no restrictions on exercising your rights and it is free of charge.

## Methods of exercising rights

A data subject can exercise his/her rights at any time by sending:

- a registered letter with acknowledgement of receipt to **SUBISSATI S.r.l.**, at 2 Via F.lli Lombardi, 60010 Ostra Vetere (AN);
- an e-mail to subissatisrl@legalmail.it

## Controller

The Controller is <b>SUBISSATI S.r.I.,</b> with registered office in 2 (AN);	2 Via F.Ili Lombardi, 60010 Ostra Vetere
Contact data: Tel. 071 731480; e-mail: subissatisrl@legalmail.it	
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