

**INFORMATION ON THE PROTECTION OF PERSONAL DATA**  
**ART. 13 EU REGULATION 679/2016**

The Privacy Policy requires us to provide you with information on the use of personal data necessary for us to implement the contract underwritten with you, and for activities in connection thereof.

In compliance with the Privacy Policy:

a) We,

Are the Controllers of the use of personal data;

b) You are the concerned party, and have the rights and obligations set out below.

**1. Data Processing**

1. The Data Controller, whose data are indicated in the foreword, shall process the Data according to the principles of lawfulness, correctness, transparency, purpose limitation and retention, data minimization, accuracy, integrity and confidentiality.

**2. Purpose, Categories and Juridical Bases of Data Protection**

1. The Data Controller shall process data to:
  - a. fulfill, even before the conclusion of any contractual relationship, if requested by you, the contract, or any specific request made by you (such as, for example, to contact you to deliver the requested services / products, or to inform you that the services / products required are ready / available);
  - b. fulfill obligations resulting from any contractual relationship;
  - c. fulfill administrative, financial, accounting and / or tax obligations;
  - d. compliance with any obligation imposed by law and / or an order of the Public Authority;
  - e. possibly, to assert or defend rights in a Court of Law;
2. The Data Controller shall use the following categories of data: first name, last name, tax information, address, email address, telephone number (or other type of contact).
3. The legal bases of data protection are the following, divided by categories of data:
  - a. Identification data: consent of the interested party and / or need to fulfill the obligations set out in points 2.1 a-e above;
  - b. Tax information: fulfill the obligations referred to in paragraphs 2.1 c-e above.

**3. Processing methods**

The data shall be:

- a. collected electronically and / or on paper;
- b. recorded in digital format on computers and / or stored in paper archives, available to the Data Controller exclusively;
- c. protected from risk of destruction, modification, deletion and unauthorized access by means of efficient physical, logical and organizational security measures;
- d. further processed, also in paper form, to the extent and over the time strictly necessary to fulfill the purpose indicated above.

**4. Notification to the Recipients and Disclosure**

1. The Data might be communicated to third parties (including Public Administration or Judicial Authorities) only to the extent strictly necessary in relation to the

aforementioned purposes, and in any case only for compliance to the law or by order of the Authority.

2. Following are the categories of possible recipients:
  - a. subjects necessary for the implementation of related activities, and consequent to the execution of the Contract;
  - b. Representatives and persons authorized by the Data Controller who have committed themselves to confidentiality or have an appropriate legal obligation of confidentiality (eg. employees and associates of the Data Controller);
3. The Data Controller may also have to disclose Data to comply with legal obligations or to comply with orders from public authorities, including judicial authorities.
4. Data shall not be disseminated.

## **5. Data Retention Period**

1. The Data Controller retains Data for the minimum amount of time necessary to achieve the Purposes referred to in paragraph 2, and in any case for no longer than fifteen years.

## **6. Mandatory nature of data disclosure**

1. Data disclosure is:
  - a. mandatory, as far as the execution of the contract or the fulfillment of legal obligations or orders of the Public Authority;
  - b. optional, as regards any other services you may have requested.

## **7. Consequences of refusal to disclose data**

7.1. In case of refusal to disclose personal data that may be required according to paragraph 6.1 a) above, it will not be possible to fulfill the contract.

7.2. In case of refusal to disclose personal data that may be required according to paragraph 6.1 b) above, it might not be possible to fulfill other services that you may have requested.

## **8. Personal rights**

1. The concerned party has the right to:
  - a. access own data in the possession of the Controller;
  - b. request data correction and / or cancellation ("oblivion");
  - c. request restrictions or oppose the use of personal data;
  - d. request data portability;
  - e. submit a complaint to the Supervisory Authority
2. The concerned party also has the rights set forth in art. 7 of the Privacy Code not expressly mentioned above (that is to obtain confirmation of the existence of data concerning him and their communication in intelligible form, the indication of their origin, the identification details of the data controllers, the transformation into anonymous form of the Data or their withdrawal if treated in violation of the Privacy Policy).
3. To assert the rights mentioned above please contact the Data Controller:

- by sending an E- Mail to the following address

- or by calling the following number