

PRIVACY POLICY – CUSTOMERS

Information notice pursuant to Article 13 of the REGULATION (EU) 2016/679 (GDPR) – Processing of personal data collected from data subject

Pursuant to Reg. UE 2016/679 (General Data Protection Regulation) we provide you the due information concerning processing of collected personal data in accordance to art. 13 of the abovementioned Regulation.

DATA CONTROLLER, pursuant to artt. 4 and 24 of the Reg. UE 2016/679, is **SI.STE.M SRL** with legal headquarter Via Modena 21 – 40019 Sant’Agata bolognese P.I. and C.F 01584631202, in person of its legal representative; Email privacy@gruppodesa.com; Phone. **051-956538**.

Personal data: any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can directly or indirectly be identified, in particular by reference to an identifier such as a name, an identification number, a location data, an online identifier or to one or more specific factors to the physical, physiological, genetic, mental, economic, cultural or social identity (C26, C27, C30).

PURPOSES OF PROCESSING | LEGAL BASIS FOR THE PROCESSING | DATA RETENTION | NATURE OF UNDERWRITING – Personal data provided will be processed for the purposes set out in the table below and in compliance with the conditions of lawfulness ex art. 6 Reg. UE 2016/679. These data will be stored for the time necessary to fulfill the purpose for which they are processed, storage period specified in the table below.

PURPOSES OF PROCESSING	LEGAL BASIS FOR THE PROCESSING	DATA RETENTION	NATURE OF UNDERWRITING
<p>Purpose A)</p> <p>- Processing necessary for the fulfilling contractual and precontractual obligations and for related administrative and accounting purposes.</p>	<p><i>Contract</i> art. 6 lett. b) GDPR: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract</p> <p><i>Legal Obligation</i> art. 6 lett. c) GDPR: processing is necessary for compliance with a legal obligation to which the controller is subject</p> <p><i>Legitimate interest</i> Recital no. 48 GDPR: data controllers belonging to a business group may have a legitimate interest in transmitting personal data within the business group for internal administrative purposes, including the processing of customers' personal data</p>	<p>10 years or otherwise stated by law Art. 2220 C.C.</p>	<p>Personal data provision is necessary for the above mentioned purposes, in order to draw up the contract between parties and to purposes related to the management of administrative and accounting fulfillments. The refusal will prevent from giving effect to the contract.</p>
<p>Purpose B)</p> <p>- SOFT SPAM: Direct e-mailing marketing in order to promote goods or services similar to those already purchased by the data</p>	<p><i>Legitimate interest</i> art. 6, paragraph no. 1, lett. f), Recital no. 47): taking into consideration the reasonable expectations of data subjects based on their relationship with the</p>	<p>Opt-out</p>	<p>Personal data provision is necessary for this purpose. You have the right to object anytime to your personal data processing for this purpose and you will not receive our</p>

subject (art. 130, par. 4 Italian D.lgs. no. 196/2003)/ Legitimate interest (art. 6 lett. f) Reg. UE 2016/679).	controller, whether a data subject can reasonably expect at the time and in the context of the collection of the personal data that processing for that purpose may take place.		communications anymore, without any prejudice to the contract.
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RECIPIENTS OR CATEGORIES OF RECIPIENTS

Your personal data will be communicated to recipients that will process the data for the above mentioned purposes as data processor (art. 28 Reg. EU 2016/679) or as person acting under the authority of the controller or of the processor (art. 29 Reg. EU 2016/679). In particular, your personal data will be communicated to: -companies of the group; - entities that provide services for the management of the information system and telecommunications networks (including e-mail); - firms or companies which provide assistance and advice; - Public authorities to fulfil legal and regulatory obligations, if requested; in case of administrative and accounting purposes, data could be transmitted to business information companies for the evaluation of solvency and payment habits and/or to other subjects for debts collection. The subjects belonging to the above categories are considered data processor, or are acting independently as data controller. List of data processor updated and available at the legal headquarter of the data controller.

DATA TRANSFER TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANIZATION

Personal data will not be transferred outside the European Union.

DATA SUBJECT RIGHTS

You may freely exercise your rights at any time under Reg. EU 2016/679 –GDPR, [Articles 15, 16, 17, 18, 19, 20, 21, 22](#) by contacting the Data Controller at the e-mail address privacy@gruppodesa.com. You have the right, at any time, to obtain from the Data Controller the access to personal data, request their rectification, erasure or processing restriction or the right to object anytime to your personal data processing. Furthermore you have the right to object to your personal data processing based on the legitimate interest, as well as to data portability. In order not to receive soft-spam email communications you have the right to contact the Data controller Without prejudice to any other administrative or judicial remedy, in case you consider your data processing in contrast with Reg. UE 2016/679, pursuant to article 15 lett. f) of Reg. UE 2016/679, you have the right to lodge a complaint with a supervisory authority – Italian Data Protection Authority (https://www.garanteprivacy.it/web/guest/home_en). In exercising your right to data portability, the Data Controller may provide your personal data in a structured, commonly used and machine-readable format. There is not any automated decision-making.

Last update: 17.12.2019

DATA CONTROLLER

SI.STE.M SRL