













	<p>1. DATA CONTROLLER AND CONTACT DETAILS DATA CONTROLLER, pursuant to articles 4 and 24 GDPR, is SI.STE.M. S.R.L., with legal headquarter in Via Modena No. 21 - 40019 Sant'Agata Bolognese (BO), Italy, in person of its legal representative, Email privacy@gruppodesa.com; Phone 051.956538.</p>
	<p>2. PROCESSABLE PERSONAL DATA 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. Your personal data shall be processed in accordance to the requirements for the lawfulness of processing set forth by Art. 6 of the Regulation EU 2016/679 for the following purposes. Your personal data will be stored for a period of time not exceeding the achievement of these purposes, as indicated below.</p>

3. PURPOSE OF PROCESSING | LEGAL BASIS | DATA RETENTION | NATURE OF PROVISION

 PURPOSE OF PROCESSING	 LEGAL BASIS	 DATA RETENTION	 NATURE OF PROVISION
<p>A) Fulfilling of contractual obligations: establish, regulate or extinguish a contractual relationship</p>	<p>Processing is necessary for the performance of a contract (R 44) Art. 6 par. 1 lett. b) GDPR</p>	<p>10 years Art. 2220 Italian Civil Code, except for contractual and extra-contractual issues that may arise and except specific legal obligations</p>	<p>The provision of data is necessary for contractual purposes. The non provision of personal data may result the impossibility to process your data for the present purpose.</p>
<p>B) Administrative and accounting purposes and legal obligations relating to the contractual relationship</p>	<p>Processing is necessary for compliance with a legal obligation to which the controller is subject Art. 6 par. 1 lett. c) GDPR</p>	<p>10 years Art. 2220 Italian Civil Code, except for contractual and extra-contractual issues that may arise and except specific legal obligations</p>	<p>The provision of data is necessary for compliance with legal obligation. The non provision of personal data may result the impossibility to be compliant with legal obligation.</p>
<p>C) Soft Spam: direct e-mailing marketing in order to promote goods or services similar to those already purchased by the data subject (art. 130, par. 4 Italian Legislative Decree No. 196/2003).</p>	<p>Legitimate interest Art. 6 par.1 lett. f) GDPR and recital 47: data processing is necessary for pursuing Data Controller's legitimate interest of promoting goods or services similar to those already purchased by the data subject, provided that the interests or the fundamental rights and freedoms of the data subject which require the protection of personal data do not prevail, having regard to the reasonable expectations of the data subject based on his/her relationship with the data controller (contractual relationship, customer).</p>	<p>Until objection (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 communications anymore, without any prejudice to the contract.</p>
<p>D) Asserting and defending one's rights, including in the context of debt collection procedures against the person concerned or a third party in any litigation.</p>	<p>Legitimate interest Art. 6 par.1 lett. f) GDPR and recital 47: data processing is necessary for pursuing Data Controller's legitimate interest, provided that the interests or the fundamental rights and freedoms of the data subject which require the protection of personal data do not prevail, having regard to the reasonable expectations of the data subject based on his/her relationship with the data</p>	<p>10 years, except objection and the time of the legal defence</p>	<p>The provision of data is necessary. The Data Controller will balance you objection with the legitimate interest.</p>

 PURPOSE OF PROCESSING	 LEGAL BASIS	 DATA RETENTION	 NATURE OF PROVISION
	controller (contractual relationship).		
<p>E) Management of the information flows (containing personal data) under the Organisational and Management Model (MOGC), adopted pursuant to Legislative Decree n. 231/2001 for preventing the administrative liability of entities for offences set out in the Decree.</p> <p>In particular, the personal data will be collected in order to enable the Supervisory Committee (OdV) to monitor the compliance with the MOGC.</p>	<p>Processing is necessary for compliance with a legal obligation to which the controller is subject Art. 6 par. 1 lett. c) GDPR</p>	<p>10 years from the closing of the file, except for contractual and extra-contractual issues that may arise and except specific legal obligations.</p>	<p>The provision of data is necessary for compliance with legal obligation (art. 6 par. 2 Legislative Decree No. 231/2001).</p> <p>The non provision of personal data may result the impossibility to be compliant with legal obligation.</p>

	<p>4. RECIPIENTS OR CATEGORIES OF RECIPIENTS</p> <p>Your personal data will be communicated to subjects who will process the data as Data Processor (art. 28 GDPR) and/or as individuals acting under the authority of the Data Controller and Data Processor (art. 29 GDPR), for the purposes listed above. In particular, the data may be communicated to recipients belonging to the following categories: - companies belonging to the group; - Subjects that provide services for the management of the information system and communication networks, including e-mail; - studies or companies within assistance and consulting relationships; - subjects and members of the Supervisory Committee (OdV) 231/2001; - Competent authorities for the fulfilment of legal obligations and/or provisions of public bodies, upon request; - in case of administrative and accounting purposes, data could be transmitted to business information companies evaluating solvency and payment habits and/or relating to debt collectioning. The subjects belonging to the aforesaid categories act as data Processors or act in complete autonomy as separate data Controllers. The list of Data Processors is constantly updated and available by writing to privacy@gruppodesa.com or at the registered office of the Data Controller.</p>
	<p>5. DOES THE DATA CONTROLLER TRANSFER YOUR DATA TO A THIRD COUNTRY AND/OR TO INTERNATIONAL ORGANISATIONS?</p> <p>Personal data will not be transferred to countries outside the EEA. In particular your data will be stored in Italy and the recipients are based in Italy.</p>
	<p>6. ARE PERSONAL DATA PROCESSED BY AN AUTOMATED MEAN?</p> <p>Personal data will be subjected to traditional manual, electronic and automated processing. The Data Controller does not process data by fully automated mean.</p>
	<p>7. DATA SUBJECT'S RIGHTS</p> <p>You may exercise your rights as expressed in Articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR, by contacting the Data Controller at the email address privacy@gruppodesa.com or at the contact details listed above. You have the right, at any time, to request the data Controller to access (art. 15), rectify (art. 16), cancel (art. 17) your personal data or limit their processing (art. 18). The controller communicates (art. 19) any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed. The controller informs the data subject about those recipients if the data subject requests it. In the provided cases, you have the right to the portability of your data (art. 20) and the Data Controller will provide you with the personal data concerning you in a structured, commonly used and machine-readable format. You have the right to object (art. 21), at any time, to the processing of your data based on legitimate interest, by contacting the Data Controller at the contact details listed above. Without prejudice to any other administrative and judicial remedy, if you believe that the processing of your data violates the provisions of the GDPR, you have the right to lodge a complaint with the Data Protection Authority, in particular in the Member State where you usually live or work or in the place where the violation of the regulation has occurred (Italian Data Protection Authority https://www.garantepriacy.it/web/guest/home_en).</p>
	<p>8. CHANGES OF THE PRIVACY POLICY</p> <p>The Data Controller reserves the right to modify, update, add or remove portions of the current Privacy Policy at his discretion and at any time. For this reason, this privacy policy contains an indication of the last update.</p>

Last update: April 2022

Data Controller
SI.STE.M. S.R.L.

