

MANUALE PRIVACY

ANTAL SRL

Documentazione redatta in ottemperanza a quanto disposto dal GDPR 2016/679 "Regolamento generale sulla protezione dei dati" e dalla normativa nazionale vigente

Via del Progresso, 10
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eM.: antal@antal.it

Dear Sirs
Company/Enterprise
Headquarters

OBJECT: Data Processing Policy pursuant to and in accordance with artt. 13 and 14 GDPR 2016/679 and current national legislation concerning data protection.

Due to your status of "Data Subject", namely the subject to whom the processed data are referred to and/or the subject that manages the data under his responsibility, we wish to disclose to you the essential elements of the processing.

Data Controller.

The Data Controller is ANTAL SRL, located in Via del Progresso, 10 - 35127 Padova (PD).

Purposes and lawful basis of the processing.

The data are collected and processed in order to pursue:

1. compliance with all legal obligations (processing is necessary for compliance with a legal obligation to which the Controller is subject in accordance with art. 6 par. 1 let. c) GDPR 2016/679);
2. operations strictly related to the establishment of contractual relationship, including but not limited to limited to the acquisition of preliminary information prior to entering into the Contract (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 in accordance with art. 6 par. let. b) GDPR 2016/679);
3. managing relationships with the Supplier, including but not limited to administration, accounting, orders, shipping, invoices, services, litigation (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 in accordance with art. 6 par. let. b) GDPR 2016/679);
4. the possible evaluation of the suppliers pursuant to GDPR 2016/679 and current national legislation (processing is necessary for compliance with a legal obligation to which the Controller is subject in accordance with art. 6 par. 1 let. c) GDPR 2016/679);
5. the possible evaluation of the suppliers based on ISO 9001:2015 standards (processing is connected to the legitimate interest of the Data Controller, equally balanced with the interests and rights of the Data Subject, as processing is strictly limited to the purpose of running the Quality Management System, in accordance with art. 6 par. 1 let. f) GDPR and the Provision of the Data Protection Authority 22nd February 2018 "Preliminary indications referred to in the explanatory statement, aimed at promoting the correct application of the provisions of Regulation (UE) 2016/679".

The collection and registration of data will be carried out for specified, explicit and legitimate purposes and in a manner that is compatible with these purposes, in relation to the processing that is required for conducting business activities. So that the data are accurate and, where necessary, kept up to date. So that the data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are collected and subsequently processed in accordance with GDPR 2016/679 and current national legislation.

Personal data may be processed with both paper and telematic means, or in any case with means suitable for recording and memorizing the data, and, in any case, their safety is guaranteed, and the utmost confidentiality of the data subject is protected. Specific security measures are observed to prevent data loss, unlawful or incorrect use, and unauthorized access in full compliance with art. GDPR 2016/679 and the current national legislation.

Mandatory or optional nature of the provision of personal data and consequences of failure to provide such data.

The provision of personal data is mandatory in order to comply with legal obligations and to establish or perform the contractual relationship. Failure to provide such data will make it impossible for the Company to take steps at your requests or to perform the contract.

Processing for purposes of legitimate interest is not mandatory and you have the right to object to such processing at any time, unless the Data Controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms.

Recipients or categories of recipients of personal data.

Without prejudice to the communications made in accordance with legal obligations, all collected and processed data may be communicated in Italy and/or abroad to:

- Professionals and consultants, consulting firms, factoring companies, lenders, debt collection companies, credit insurance companies, commercial information companies, transportation companies;
- Public and private entities, also following inspections or supervision activities, such as: Financial Administration, Tax Police Bodies, Judicial Authorities, Italian Office of Change, Labour Inspectorate, ASL, Social Security, ENASARCO, Chamber of Commerce, etc;
- Subject who are legally entitled to access your data;

Personal data may be processed by employees and co-workers assigned to the competent Company offices, explicitly authorized in accordance with art. 29 GDPR 2016/679 and current national legislation.

The data provided may also be communicated to professionals and/or Companies responsible for consulting activities related to the legal, technical and/or development fields, management, administration and accounting, within the provisions of the current laws and regulations, as well as the consequent obligations for the Company. In this case, these subjects will identify as Data Processor under art. 28 GDPR 2016/679 and current national legislation.

The complete and up-to-date list of the Data Processors is available, upon request of the right holders, at the headquarters of the Data Controller.

Transfers of personal data abroad.

Your data may be communicated and/or transferred abroad only to perform the contractual obligations and/or the mandate to which you are party, or in order to take steps at your requests before entering into a contract, or to enter the contract or to perform it, in your favour, in full

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ANTAL SRL			Partita IVA/C. Fiscale: 00699000287

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respect of artt. 44 s.s. GDPR 2016/679, or for strictly technical reasons due to the structure of the company IT System and/or for the implementation of technical and organisational measures which the Data Controller has deemed adequate (art. 32 GDPR 2016/679).

Data retention.

Provided data shall be retained in our filing systems according to the following parameters:

- Data processed for activities pertaining to administration, accounting, orders, quotations management, production flow management, assistance and maintenance, shipping, invoice, services, litigation: 10 years as established by law (art. 2220 Civil Code), without prejudice to potential payment delays, which justify extensions;
- Data processed for supplier evaluation purposes: 36 months;
- Other data not mentioned above, processed for contractual purposes: until contract expiration and/or for the duration of the commercial relationship connected to the supply;

and, in any case, under the rules of art. 5 GDPR 2016/679 ('storage limitation principle'). Verifications on data obsolescence in relation to their purposes are performed periodically.

Rights of the data subject.

In relation to such personal data, the Data Subject can exercise his rights within the conditions set by artt. 15-22 GDPR 2016/679 and current national legislation. In the case of signing any kind of consent to data processing upon request of ANTAL SRL, it shall be noted that the Data Subject may withdraw it at any time, without prejudice to mandatory obligations in accordance with legislation applicable at the time of the request, by contacting the Data Controller at the following e-mail address: antal@antal.it.

Right to lodge a complaint.

If any data subject deems that the processing of his personal data is occurring in violation of the requirements of GDPR 2016/679, he has the right to lodge a complaint to the Data Protection Authority, pursuant to art. 77 GDPR, or to refer to the competent courts (art. 79 GDPR 2016/679).

Padova, 23/10/2020

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