

MANUALE PRIVACY

ANTAL SRL

Via del Progresso, 10

35127 Padova (PD)

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eM.: antal@antal.it

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

Dear Sir / Madam

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.

Purposes of the processing.

The data are collected and processed in order to pursue:

1. compliance with legal obligations, including but not limited to tax legislation applicable when conducting business activities and anti-money laundering legislation;
2. the establishment and performance of on-going contractual relationships, as well as potential pre and post sale assistance;
3. activities strictly related to the establishment of said relationships, including but not limited to the acquisition of preliminary information prior to entering into the Contract;
4. managing Customer relationships including but not limited to administration, accounting, orders, shipping, invoices, services, litigation;
5. providing services pertaining logistics of means, things and people related to the main supply;
6. collecting information on Customer satisfaction, elaboration of statistics for internal usage;
7. in particular, sending advertising and direct-sales material, market research or commercial communication both automated (e-mail, other remote communication systems via communication networks such as, for example: sms, mms, whatsapp) and traditional (mail) by the Data Processor, in full compliance with the GDPR 2016/679, current national legislation and the Provision by the Italian Data Protection Authority 04/07/2013 "Guidelines on promotional activity and contrast to spam");

The data will also be processed in respect of the principles of fairness, lawfulness, transparency, as well as in respect of your discretion and rights.

Contractual purposes, service supply, litigation and commercial purposes only apply to the Client's data. The Client's data will be processed for the duration of established contractual relationships, as well as after it, in order to comply with legal obligations, as well as for future commercial purposes according with current legislation.

Lawful basis.

The data 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 (art. 6 par. 1 let. b) GDPR 2016/679) or for compliance with a legal obligation to which the Controller is subject (art. 6 par. 1 let. c) GDPR 2016/679). Treatment for marketing purposes is subject to consent, except in the cases where it may be excluded under art. 130 par. 4 D.Lgs 30 June 2003, No. 196.

Anti-Money Laundering and Anti-Terrorism.

The provision of the data required by Anti-Money Laundering and Anti-Terrorism legislations is mandatory; failure to provide such data will preclude the professional service required and the operation may be reported to the competent supervisory body. In this regard, the data processing connected to anti-money laundering obligations will take place within the specific arrangements imposed on non-financial operators by the Regulation on the identification and retention of information under art. 3 par. 2, of D.Lgs. 56/2004 adopted with D.M. 143/2006. Other information may also be drawn from public sources in order to comply with the obligations of D.Lgs. 231/2007.

Means of data processing.

The processing of data for the above-mentioned purposes takes place both with automated means, electronic or magnetic, and with non-automated means, in paper form, in respect of the rules of confidentiality and security required by law, consequent regulations and internal policies.

Place of data processing.

Data are processed and archived at the Data Controller's headquarters in Via del Progresso, 10 - 35127 Padova (PD). Data are also processed, on behalf of the Data Controller, by professionals and/or Companies who are tasked with technical activities, development, management, administration and accounting, identified as Data Processor, whose list is available, upon request of the right holder, at the Data Controller's headquarters.

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.

Consent to the provision of personal data for informational, commercial and/or marketing purposes is optional and, if conferred, it can be withdrawn at all times with no prejudice to the lawfulness of the processing based on previous consent. Failure to provide consent, or its withdrawal, will make it impossible for the Company to send you commercial communications.

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:

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| ANTAL SRL | | | Partita IVA/C. Fiscale: 00699000287 |

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- 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;

Transfers of personal data abroad.

Your data may be communicated and/or transferred abroad, also towards Third Countries outside of the European Union, only to perform the contractual obligations and/or the mandate of 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 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:

- 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;
- Compliance with anti-money laundering legislation: 10 years.
- Collection of information on Customer satisfaction, elaboration of statistics for internal usage (p. 6 above): until contract expiration and/or for the duration of the commercial relationship connected to the supply;
- Informational, commercial and/or marketing purposes: 60 months, considering the type of product offered, the warranty period and the usual re-purchase time range.

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 by contacting the Data Controller at the contact details below, without prejudice to the mandatory obligations in accordance to current legislation at the time of the request.

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).

Data Controller.

The Data Controller, to whom you may refer to in order to exercise your rights (artt. 15-22 GDPR 2016/679), is ANTAL SRL, located in Via del Progresso, 10 - 35127 Padova (PD). The Data Processor list is available, upon request of the right holders, at the headquarters of the Data Controller. Such rights may also be exercised by sending notice to the following e-mail address: antal@antal.it.

Padova, 06/10/2020

ANTAL SRL

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CONSENT FORM
(Pursuant to art. 7 GDPR 2016/679 and current national legislation)

The Data Subject has been provided with the necessary information pursuant to artt. 13-14 GDPR 2016/679 and current national legislation, and **consents to the processing and communication of personal data**, within the purposes, means and data retention policies stated above, to the extent that such consent is required by law.

All authorizations issued by the Data Subject can be withdrawn at any time by means of a letter A/R addressed to the Data Controller; such withdrawal will take effect only the day after the letter is received, without any retroactive effect, without prejudice to the processing required by law.

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| <p>Processing of personal data for sending you informational, commercial and marketing material concerning the services provided by ANTAL SRL, also via Newsletter (OPTIONAL processing):</p> <p style="text-align: center;"> <input type="checkbox"/> I CONSENT <input type="checkbox"/> I DO NOT CONSENT </p> |
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| DATE | CLIENT <i>(Surname and Name or Company Name, legible)</i> | SIGNATURE <i>(with Stamp for Clients with VAT Number)</i> |
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| 06/10/2020 | | |

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