

Dear Data Subject

The Writer: **ITALTRECCE SRL**

With registered office in: Via Moncalieri 99/26-10048 Vinovo (TO)

As Controller of Processing of personal data, we inform you, in accordance with the EU Regulation 2016/679 "European Regulation" and the national regulations applicable, that the processing of your personal data is performed within the establishment and at the branch offices (local units) in full compliance with the above mentioned provisions, guaranteeing respect of fundamental freedoms and dignity of the data subject, defending in particular confidentiality and protection of data. It is noted that the information is related to personal data provided by the data subject or delegates by the data subject and to any data requested in future compatibly with the following purposes, obtained directly from these individuals or through public domain computer systems where the data subject can disclose information in order to be contacted later by potential clients.

According to Articles no. 13 and 14 of the Regulation, we provide you with the following information:

▪ **Means of processing of personal data**

Data processing can/will be performed by hardcopy and/or computer systems and related electronic facilities (even remote equipment with appropriate protection and security systems) by entities specifically appointed and trained in terms of security and data processing, for the following purposes. Any further data processing for different purposes will be properly disclosed with corresponding consent, if necessary, concerning mandatory rules.

▪ **Purposes pursued**

- A. Administrative, accounting and fiscal management of the company
(billing, organization of works, etc.)
- B. Operational and internal/external logistics management
(delivery and/or collection of goods or vehicles, communications on the status of work)
- C. Provision of services, materials, manufacturing, specialist services
(non-exhaustive list: consultancy, supply of materials, interventions on buildings, facilities, professional and technical services, logistics, training, etc.)
- D. Management of possible litigation between parties
(claims, breaches of contracts by the parties)
- E. Filing of technical / administrative documentation
(storage of tax and contract documentation, contract and supplied products warranty communications, in compliance with legal obligations)

▪ **Communication of personal data**

Data in our possession will be processed by internal parties (appointed or Processors) in relation to the functions carried out by them within the organization, in order to pursue the purposes listed above and based on relationships existing between the parties. The organization also relies on third parties with reference to specific activities related to particular professionals and/or technical profiles, which involve data processing. These third parties are appointed external data Processors and they are therefore subject to legal obligations in force for this role.

The categories of recipients are as follows:

INTERIOR RECIPIENTS

Employees of the company or collaborators with various type of contracts under direct control of the Controller of the processing of personal data

EXTERNAL RECIPIENTS

Tax consulting firms (accountants, tax advisors, etc.)

Technical consulting firms (safety at work, etc.)

Disclosure to third parties will be executed to the extent strictly necessary in order to follow up specific contract liabilities between the parties or under legal obligations (e.g. book-keeping and tax accounting, rules for safety at work). It follows that not all entities mentioned above will be able to process the data, but only the internal or external parties responsible for carrying out a particular and compulsory processing will be entitled.

▪ **Transfer of data to third countries and international organizations**

The controller of processing of personal data shall not transfer data to a third country or to international organizations for activities involving the processing of personal data of data subject.

▪ **Obligation (or not) of consent**

Processing of personal data is allowable only after consent by the data subject. Such consent may be optional or compulsory in accordance with law applicable in relation to pursued purposes.

Because of the principle of "necessity" of data (excluding request for data not strictly necessary), the data subject is informed that for the purposes reported above eventual refusal to give consent will in fact

determine the inability to carry out the expected processing, making unfeasible the services of relationship between parties or fulfilment of particular legal obligations.

▪ **Retention of data**

Retention of collected data, without prejudice to the exercise of the rights of the data subject as indicated below, is limited to a strict minimum, in order to complete the order, assignment or service required in addition to any other data retention provided for guarantees by domestic or European law (e.g. storage of tax files). Information which is no longer necessary either to be retained in accordance with legislation or as a protection of the data subject, will be destroyed or returned if they are original documents, without retention of copies. Further information about the period during which personal data are stored in relation to various range of cases may be requested from the data controller and its handlers through communication channels described in this notice.

▪ **Profiling and automated means**

Processing of personal data is performed without any system or automated means, such as to make impacting decisions on data processing and on legitimate interests of the data subject, nor the profiling of the data subject is expected.

▪ **Controller of processing**

The entity identified under the EU Regulation as the Controller of data processing to whom it is possible to submit any request and to exercise the rights guaranteed to the data subject pursuant to domestic law and Articles from no. 15 to 22 of EU Regulation 2016/679 is:

ITALTRECCE SRL

Via Moncalieri 99/26 - 10048 VINOVO (TO)

Phone number 011 9935811, e-mail address: marzia.sofia@internationalwire.it

▪ **Processors and/or reference entities**

Entity/entities identified as handler(s) for information requests and for the exercise of the following rights is/are:

Privacy Administrative Representative (to be mentioned in the request)

▪ **Rights of the data subject (Articles from no. 15 to 22 of EU Regulation)**

Data subject may exercise the following rights, without prejudice to any particular obligation, which the organization is obliged to fulfil under domestic law applicable, EU regulation and other laws governing the management of particular personal data:

1. Data subject shall have the right to obtain confirmation whether or not personal data relating to him or her are being processed, even if there are not yet recorded, and their communication in intelligible form.

2. Data subject shall have the right to obtain the indication:

(a) about the origin and the categories of personal data;

(b) about the purposes and means of data processing, as well as the indication of the period for which the personal data are stored;

(c) about the logic applied in case of processing performed by electronic means;

(d) about identification details of the controller, the processors and the designated representative;

(e) about entities or categories of parties to whom personal data may be communicated or may become aware in the territory of the State, European Union or third countries, such as processors or delegates and to receive information about appropriate guarantees on transfer and processing.

3. Data subject shall have the right to obtain:

(a) the updating, the rectification of data or, when interested, the right to have incomplete personal data completed;

(b) the erasure ('right to be forgotten'), the transformation in anonymous form or the block of the processed data, including those which are no longer necessary in relation to the purposes for which they were collected or subsequently processed, without prejudice to obligations of legal nature or protection of the data subject and in particular in case of illicit processing;

(c) certification that operations referred to (a) and (b) above have been disclosed, even concerning their content, to those entities to whom the data have been communicated or circulated, except the case in which such fulfilment is impossible or involves means manifestly disproportionate to the protected right.

4. Data subject shall have the right to objection or restriction, in whole or in part:

(a) for legitimate reasons to the processing of any personal data relating to him or her, although relevant to the purpose of collection;

(b) to the processing of any personal data relating to him or her arising from automated means or profiling (without prejudice to any contract obligation between the parties) with particular regard to marketing purposes and similar.

5. Data subject shall also have the right:

(a) to lodge a formal complaint with supervisory authority (more information are available on www.garanteprivacy.com);

(b) to obtain all information available on the origin of the data that are not directly collected from the data subject;

(c) to receive copies of data stored without affecting rights and freedoms of others;

(d) to request data portability, where the nature of processing makes it technically feasible.

More information can be obtained from the data controller or by consulting articles of applicable laws mentioned above.