

# Effeti S.R.L. - Privacy Policy pursuant to Article 13 of (EU) Regulation No. 679/2016 ("GDPR")

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Effeti Srl, as provided for by Italian privacy regulations and European Union Regulation No. 679/2016 (hereinafter "GDPR") with particular reference to Article 13, protects the confidentiality of personal data and guarantees necessary protection against any event that may put it at risk of violation.

This document was designed on the basis of the principle of transparency and in accordance with all the requirements set by the GDPR. It is divided into individual sections each one dealing with a specific topic, in order to facilitate reading and understanding.

## PERSONAL DATA AND THEIR OWNER

The expression "personal data" refers to any information relating to an identified or identifiable natural person, who the GDPR calls "data subject". This document refers to the "data subject" as the "Owner" (of personal data). In other words, the Owner is a natural person who can be identified, directly or indirectly, by means of those personal data.

## HOLDER OF THE TREATMENT

The holder of data treatment, also called Data Controller (hereinafter "Holder"), is the subject who determines the purposes and means of the processing of personal data, actually managing its collection and processing.

For the purposes of this Privacy Policy, the Holder is

Effeti Srl - Via Bruno Buozzi, 8/a 31044 Montebelluna, (TV)

in the person of its legal representative, who can be contacted at [info@effeti.eu](mailto:info@effeti.eu).

Effeti Srl collects or receives, within the scope of normal business activities and limited to them, the information listed in the following table:

Type of data	Details
Data relating to natural persons	name, surname, address, nationality, tax ID number, landline and mobile phone numbers, fax numbers, email addresses
Data relating to companies, professionals, institutions and commercial activities	business name, addresses of legal and operational offices, VAT number, tax ID number, landline and mobile phone numbers, fax numbers, email addresses, contact info
Data relating to contractual relationships	type of contract, information related to its execution, essential information for its fulfilment
Accounting data	data concerning economic relationships, due sums, payments.

Under no circumstances does Effeti Srl request to provide any so called "sensitive data", that is, according to the GDPR provisions (Art. 9), those personal data which may reveal racial or ethnic origins, political opinions, religious or philosophical convictions, union memberships, health status, sexual habits or orientations, genetic or biometric information capable to uniquely identify a physical person.

## WHAT IS THE LEGAL BASIS FOR THE TREATMENT?

The processing of personal data by the Holder occurs in the event that one of the following conditions takes place:

- Processing is necessary to fulfil contractual or pre-contractual commitments or obligations;

- Processing is necessary to satisfy requests for information or requests for supply of products and services;
- Processing is necessary to fulfil legal obligations;

## **WHAT ARE THE PURPOSES OF THE TREATMENT?**

The processing of personal data is aimed solely at the need to comply with the contractual conditions and to meet the requests for services and supplies, also in compliance with the fulfilments and obligations of the law. Any partial or incorrect provision of data can lead to the company being unable to provide the requested services.

Here is a detailed description of the possible purposes:

- Acquisition of information necessary for the completion and execution of the contract or the supply of the requested products and services;
- Acquisition of information necessary for the management of any commercial relationship, in progress or being defined;
- Management of commercial activities;
- Compliance with regulatory, accounting, administrative and tax obligations;
- Protection and possible recovery of credit, directly or through third parties (debt collection Agencies/Companies) who will be provided with the data necessary for these purposes.
- Protection of contractual rights;

## **TO WHOM CAN DATA BE DISCLOSED?**

Personal data will be processed exclusively by authorized persons and by persons explicitly designated as Data Processors, in compliance with the GDPR, in order to correctly carry out all the activities necessary to pursue the purposes referred to in this Privacy Policy. Personal Data may be disclosed to Public Bodies or Judicial Authorities, where required by law or to prevent or suppress the commission of a crime and, in any case, to:

- who is the legitimate recipient of communications required by law or regulations (Public Offices and Authorities, Judicial Authorities ...);
- who is the recipient of communications necessary to fulfil the obligations deriving from the contract or relating to the supply of the requested products and services;
- companies and/or collaborators for the management of administrative services that the Holder uses to fulfil its own legal or contractual obligations;
- our agents, representatives or distributors;
- other subjects (companies, firms, natural persons) who collaborate with the Holder in realizing contracts or in supplying products and services to customers.

The Holder imposes on its own third-party suppliers and on the Data Processors the respect of security measures equal to those adopted towards the Owner, by restricting the perimeter of action of the Data Processors to the treatments strictly related to the requested service.

## **HOW LONG IS YOUR DATA STORED?**

Personal data will be stored for the entire duration of your registration and in any case for no longer than a maximum period of 12 (twelve) years. Furthermore, personal data will in any case be stored to comply with obligations (e.g. tax and accounting purposes) which may continue even after termination of the contract (Art. 2220 Civil Code); for these purposes, the Controller shall retain only the data necessary to complete these activities.

## HOW CAN THE ISSUED CONSENT BE REVOKED?

The Owner can, at any time, exercise his right to (totally and / or partially) revoke the consent issued to the Holder, without prejudice to the lawfulness of the previous processing (based on the originally issued consent).

To revoke the consent, the Owner can contact the Holder at the addresses provided in this Privacy Policy.

## WHERE DOES DATA TREATMENT TAKE PLACE?

All collected data are stored in paper and electronic archives, which are located at the company headquarters, in the Italian territory.

The processing of data can be accomplished manually (eg using paper) or by means of computer equipment and electronic tools. All used tools and procedures, however, are suitable to ensure security and confidentiality.

## WHAT ARE THE RIGHTS OF THE OWNER?

The Owner has the right to obtain confirmation of his data being (or not being) stored and/or processed. He also has the right to obtain a comprehensive communication, in intelligible form, of those data.

In more detail, the Owner has the right to obtain information about:

- the amount and type of his personal data being processed (obtain a copy);
- the purposes and methods of treatment;
- the logic applied in case of treatment carried out with the aid of electronic instruments;
- the identity of the Holder, the manager and the designated representative;
- the persons or categories of persons to whom the personal data can be communicated;
- the categories of personal data which are being collected and processed;
- the retention period of the data or the criteria used to determine that period;
- the existence of automated decision-making processes and the logic applied by them, particularly with regard to the profiling;

Moreover, the Owner has, at any time, the right to:

- have his data rectified by the Holder if they are inaccurate or incomplete;
- obtain a copy of his processed personal data (portability), given that this does not affect the rights and freedoms of others, possibly also requiring the Holder to transmit data directly to another Holder.
- have his personal data erased by the Holder (without unjustified delay) in the event that the conditions outlined in the GDPR, Article 17 occur. That is, for example: if the data is no longer needed for processing, if the data is considered illegal and, in any case, if for some equally legitimate reason the processing is not justified;
- obtain restriction of processing from the Holder, in those cases outlined by Italian privacy regulations and by Art. 18 of the GDPR. That is, for example, a restriction period (after the Owner has disputed the correctness) enabling the controller to verify the accuracy of the personal data;

The Owner also has the right to object, in whole or in part, for legitimate reasons, to the processing of his personal data, even if pertinent to the purpose of the collection.

The Owner will be able to exercise the aforementioned rights by contacting the Holder (Effeti Srl) in one of the two following ways:

- traditional mail to Effeti Srl - Via Bruno Buozzi, 8/a - 31044 Montebelluna (TV)
- e-mail to [info@effeti.eu](mailto:info@effeti.eu).

Pursuant to art. 77 of the GDPR the Owner has also anyway, when he/she believes that the data processing infringes the current Privacy Laws, the right to lodge a complaint with the suitable local control authority, that is, with the agency that exercises its duties and rights within the specific member country where the infringement is deemed to have occurred (eg the Italian Personal Data Protection Authority).