

# PRIVACY POLICY



**Subject:** Information pursuant to and for the effects of the GDPR EU 2016/679 concerning the protection of personal data processing

In your role as "Owner" and "Interested Party", namely the subject to which the data processing refers to and/or are responsibly managed by you, we wish to update you regarding the essential features of the processing carried out

## **Aim of the processing.**

The collection and processing of personal data is carried out in order to conduct:

1. meeting of all the regulations imposed by statutory obligations, the fiscal and tax provisions deriving from running the business activity and the prescribed provisions on anti-money laundering;
2. implementation and execution of contractual relationships in progress, as well as any potential presales and post-sales support;
3. transactions strictly connected and instrumental to starting the aforesaid relationships, including the acquisition of preliminary information upon conclusion of the Contract;
4. management of relations with the Customer for administration, accounting, orders, shipping, invoicing, services and resolution of any dispute;
5. assessing the level of customer satisfaction, the development of statistics for internal use;
6. in particular, for sending advertising or direct promotional material, carrying out market research or commercial communication both with automated methods (e-mail, other remote communication systems using online networks, such as, by way of example: SMS, MMS, WhatsApp) and traditional (paper mail), by the Owners.

And will be subject to treatment based on the principles of correctness, lawfulness, transparency and protection of your privacy and rights. The contractual purposes, provision of services, commercial, non-commercial, and promotional aims relate solely to the processing of the Customer's personal data. The Customer's personal data shall be processed for the full duration of the contractual relationships set, as well as subsequently to fulfil all legal requirements, as well as for the future commercial purposes.

## **Anti-money laundering and anti-terrorism.**

The provision of data required by the legislation on Anti-Money Laundering and Counter-Terrorism is mandatory and any failure to respond precludes the requested professional service and may involve reporting the transaction to the competent supervisory body. In this regard, it should be noted that the processing of personal data related to anti-money laundering obligations will be implemented with regard to the specific implementation procedures imposed on non-financial operators by the Regulation on the identification and retention of information envisaged by article 3 paragraph 2 of Legislative Decree no. 56/2004 and implemented with Ministerial Decree no. 143/2006. Other information could also be taken from public sources to comply with the obligations under Legislative Decree 231/2007.

## **Processing method.**

The processing of data for the purposes outlined is carried out using either automated, electronic or magnetic, or non-automated means, on paper, in compliance with the legal regulations governing confidentiality and security, and the resulting regulations and internal provisions.

## **Data processing site.**

The data is currently processed and archived at the offices in Via Terraglio, 195, 31022, Preganziol (TV). Furthermore, they are also processed, on behalf of the undersigned, by professionals and/or companies tasked with carrying out technical, development, management and administrative - accounting processes.

## **Compulsory or optional provision of data.**

Some data are indispensable for the establishment of the contractual relationship or for its execution, while others can be defined as accessories to said purposes. The provision of data to the writer is mandatory only for data for which there is a legal or contractual obligation.

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## Consequences of a refusal to provide data.

In cases where the provision of data is required by a regulatory or contractual obligation, any refusal would put the Supplier in the conditions of not being able to carry out or execute the Contract further as it would constitute an unlawful processing. In cases where there is no legal obligation to provide data, the refusal would not have the consequences mentioned above but would still prevent the execution of ancillary operations.

## Disclosure of data.

Without prejudice to communications and disclosures carried out in order to meet legal obligations, your Personal Data may be communicated in Italy and/or abroad to:

1. Professionals and consultants, consultancy companies, factoring companies, credit institutes, debt collection companies, credit insurance companies, commercial information companies, companies operating in the transport sector;
2. Public and private bodies, also following inspections or audits such as: Financial Administration, Tax Inspection Bodies, Judicial Authorities, Italian Exchange Offices, Labour Inspectorate, Local Health Authorities, Departments of Social security, ENASARCO, Chamber of Commerce, etc.;
3. Other customers also residing abroad (see the following specific point);
4. Subjects who can legally access your data.

Sensitive data, even if processed in a completely anonymous form, will not be subject to any form of diffusion and/or transfer, except for meeting the purposes set out by this and upon specific written authorisation from you.

## Communicating of data abroad.

Customer data may be communicated to other companies, clients of SECCO SISTEMI SPA, based in third party non-European countries, only for meeting the obligations arising from the service contract of which the Customer is an interested party or to meet, before conclusion of the contract, specific requests, or for the conclusion or execution of a contract stipulated in your favour (under article 43 letter b) of Legislative Decree 196/03).

## Data retention times.

The data provided will be stored in our archives according to the following parameters:

1. For administration, accounting, orders, budget management and the entire production flow, assistance and maintenance, shipping, invoicing, services, management of any disputes: 10 years as established pursuant to the legal provisions under article 2220 of the Italian Civil Code, without prejudice to any delayed payments of the equivalents that warrant extensions;
2. For the purposes set out in paragraphs 5 above, the data retention times are up to the expiry of the contract and/or commercial supply relationship;
3. For marketing purposes (point 6): 24 months.

## Rights of the interested party.

With regard to the personal data themselves, the Customer may exercise the rights envisaged within the limits and under the conditions set out in the 2016/679 European Regulation and the applicable Legislation. In case of signing of any form of consent to the treatment requested by SECCO SISTEMI SPA, please note that the interested party can revoke it at any time, without prejudice to the mandatory requirements of the current legislation at the time of the request for revocation, by contacting the Data Controller at the following addresses.

## Data controller and data processor.

The data controller, to whom you can contact to assert the above rights, is SECCO SISTEMI SPA, with registered office in Via Terraglio, 195, 31022, Preganziol (TV). Responsible for the processing is the Legal Representative Pro Tempore. The aforementioned rights may also be exercised by you with a communication to the following e-mail address:

[info@seccosistemi.it](mailto:info@seccosistemi.it)

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