

## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

SIDASTICO Spa, with registered office in Via Astico 44 - 36030 - FARA VICENTINO - Vicenza - IT, VAT number 02931940247 (hereinafter "Data Controller"), in its capacity as Data Controller, informs you pursuant to art. 13 of Legislative Decree No. 196 of 30.6.2003 (hereinafter, "Privacy Code") and art. 13 of EU Regulation no. 679/2016 (hereinafter "GDPR") that your data will be processed in the following manner and for the following purposes:

### 1. Subject-matter of the Processing

The Data Controller processes the personal data, such as name, surname, company name, address, telephone number, e-mail address, bank and payment details - hereinafter, "personal data" or simply "data") that you have communicated when entering into a contract with the Data Controller for the provision of its services.

### 2. Purposes of the processing

Your personal data are processed without your express consent (Article 24 (a), (b), (c) Privacy Code and art. 6 (b), (e) GDPR), for the following Service Purposes:

- conclude contracts for the Data Controller services;
- fulfil pre-contractual, contractual and tax obligations arising from relations in place with you;
- fulfil the obligations established by law, by a regulation, by community legislation or by an order of the Authority (e.g. for anti-money laundering);
- exercise the rights of the Data Controller, e.g. the right to defence in court;

### 3. Processing methods

The processing of your personal data is carried out through the operations specified in art. 4 of the Privacy Code and art. 4(2) of the GDPR, and more precisely: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.

Your personal data will be processed both in paper format and electronically and/or through automated methods.

The Data Controller will process your personal data for the time necessary to fulfil the aforementioned purposes and in any case for no more than 10 years from the end of the relationship for Service Purposes, subject to the requirement of longer storage at the request of the authorities in charge of preventing and prosecuting offences or, in any case to assert or defend a right in court.

### 4. Access to data

Access to your data for the above purposes can be granted:

- to employees and collaborators of the Data Controller or of other companies in Italy and abroad, in their capacity as persons in charge of processing and / or internal data processors and/or system administrators;
- to third-party companies or other parties to whom activities have been outsourced by the Data Controller, in their capacity as external data controllers.

## 5. Disclosure of data

With no need for express consent (Article 24(a), (b), (d) Privacy Code and art. 6 (b), (e) GDPR), the Data Controller may disclose your data for the purposes referred to in point 2. to Supervisory Bodies, Judicial Authorities and to other parties when disclosure is mandatory pursuant to law for the fulfilment of the mentioned purposes. These parties will process the data in their capacity as independent data controllers.

**UNDER NO CIRCUMSTANCES WILL YOUR DATA BE DISCLOSED TO THE PUBLIC.**

## 6. Data transfer

Personal data are stored on servers managed by the Data Controller, within the European Union. In any case, it is understood that, if necessary, the Data Controller shall be entitled to move the servers outside the EU. In this case, the Data Controller hereby ensures that the transfer of data to non-EU countries will take place in accordance with the applicable laws, subject to the stipulation of the standard contractual clauses laid down by the European Commission.

## 7. Nature of the provision of data and consequences in case you refuse to reply

The provision of data for the purposes referred to in point 2. is mandatory. Without such data, we cannot guarantee the Services mentioned in the aforesaid article.

## 8. Rights of the data subject

In your capacity as data subject you have the rights set forth in art. 7 of the Privacy Code and art. 15 of the GDPR and precisely the rights:

- to obtain confirmation of the existence or otherwise of Personal Data concerning you, including if not yet recorded, and communication of such data in intelligible form.
- to obtain information about:
  - a) the origin of the personal data;
  - b) the purposes and methods of processing;
  - c) the logic applied in the processing carried out using electronic instruments;
  - d) the identification details of the Data Controller, the Data Processors and the designated representative pursuant to Art. 5, paragraph 2 of the Privacy Code and art. 3, paragraph 1, of the GDPR;
  - e) the entities or categories of entities to whom the personal data may be disclosed or who can learn about them in their capacity as appointed representative in Italy, data processors or persons in charge of the processing.

- to obtain:
  - a) the updating, rectification or, where it is in your interest, the inclusion of additional data;
  - b) the cancellation, conversion into anonymous data or blocking of any data that are processed unlawfully, including data that need not be retained for the purposes for which they were collected or subsequently processed;
  - c) a declaration stating that the operations referred to in a) and b) above, and their content, have been notified to those to whom the data were communicated or disclosed, except where fulfilling this obligation proves impossible or requires a manifestly disproportionate effort compared to the right to be protected;
- to object, in whole or in part:
  - a) based on legitimate grounds, to the processing of your personal data, although they are relevant for the purposes of the collection;
  - b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without an operator by e-mail and / or through traditional marketing methods by telephone and / or printed mail.

It should be noted that the Data Subject's right to object to the processing, set out in point b) above, for direct marketing purposes through automated methods extends to the traditional methods and that in any case the data subject can exercise the right to object to just part of the processing. Therefore, the data subject may decide to only receive communications through the traditional methods or through automated communications, or none of the two types of communication.

Where applicable, the data subject also has the rights referred to in Articles 16-21 GDPR (Right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object), as well as the right to complain to the Privacy Authority.

## **9. Data Controller, data processor and persons in charge of data processing**

The Data Controller is SIDASTICO Spa - Via Astico 44 - 36030 - FARA VICENTINO - Vicenza - IT.

The updated list of data processors and persons in charge of processing is kept at the registered office of the Data Controller.

## **10. How to exercise your rights**

You can exercise your rights at any time:

- By mail, by writing to SIDASTICO Spa - Via Astico 44 - 36030 - FARA VICENTINO - Vicenza - IT;
- By email, by writing to [privacy@sidastico.com](mailto:privacy@sidastico.com)