

# Information notice on the processing of personal data

[Article 13 of Regulation (U.E.) no. 679/2016]

# Dear Customer,

pursuant to the provisions of art. 13 of Regulation (EU) no.679/2016 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, we hereby provide you with the following information:

# Contact details of the data controller

The data controller is INOXA SRL, at Via dell'Industria ,28 -60020 Polverigi (AN), that may be contacted at 071906324 and at the e-mail address *info@inoxa.it*.

# Contact details of the data protection officer (DPO)

We have not appointed a data protection officer, as INOXA SRL is not bound by this legal obligation and has assessed that such an officer is not currently needed within its organisational structure.

# Purposes of and related legal basis for the processing of your personal data

Your personal data will be processed lawfully, fairly and transparently for the following purposes:

- The performance of precontractual activities that you have requested from the Data Controller and/or the manufacture of products that you have requested from the Data Controller, indicated in the contract that you have signed with the Data Controller or in the order confirmation: the legal basis is the signed contract, pursuant to art. 6, para. 1, letter b) of the Regulation (EU);
- the fulfilment of the related administrative, accounting and tax requirements that derive from legal obligations: the legal basis is the legal obligation, pursuant to art. 6, para. 1, letter c) of the Regulation (EU);
- the fulfilment of the related additional legal requirements that derive from legal obligations: the legal basis is the legal obligation, pursuant to art. 6, para. 1, letter c) of the Regulation (EU);
- the sending by e-mail of news relating to the economic activity of INOXA SRL and to the events organised by the company, also via the sending of newsletters: the legal basis is the consent granted, pursuant to art. 6, para.1, letter a) of the Regulation (EU).

We would like to remind you that it is necessary to keep your data updated; hence INOXA SRL has adopted suitable measures in order to guarantee any prompt rectification of said data.

## Categories of your personal data subject to processing

INOXA SRL only collects and processes your personal data to the extent that they are suitable, pertinent and absolutely necessary, in compliance with the purposes listed above. They will therefore pertain to:

- for example, only your name, your personal details, your contact details and, in any case, if absolutely necessary for the performance of the precontractual activities or for the supply of the products that you requested from the Data Controller, indicated in the contract that you have signed or in the order confirmation with the Data Controller and for fulfilling the related administrative, accounting and tax requirements, that derive from legal obligations, and the related additional legal requirements, that derive from legal obligations, including additional special categories of personal data, pursuant to art. 9 of the Regulation (EU);
- your name and e-mail address in order to send you by e-mail news relating to the economic activity of INOXA SRL and to events organised by the company.

## Categories of recipients of your personal data subject to processing

The term "recipient" means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, with the exception of Public Authorities which receive personal data in the framework of an inquiry, pursuant to art. 4 no. 9 of the regulation (EU).

With regard to the processing of your personal data by INOXA SRL, the recipients of your personal data may be:

• employees and collaborators of the Data Controller, in their capacity of persons authorized for the processing of personal data and processors of personal data, respectively, in order to perform the precontractual activities and provide the services that you have requested from



INOXA SRL, as indicated in the contract that you have signed with the Data Controller; to fulfil the related administrative, accounting and tax requirements that derive from legal obligations; and the related additional legal requirements that derive from legal obligations; to send by e-mail news related to the economic activity of the Data Controller and to the events organised thereby. We would like to point out that all said subjects have been duly trained regarding the suitable measures to be adopted for the protection of the personal data;

- subjects external to our organizational structure which include, but are not limited to, banking and financial institutions, with which we have stipulated agreements that lay down the appropriate measures to be adopted to guarantee the protection of the personal data entrusted to them, for the purpose of providing the services that you have requested from INOXA SRL, indicated in the contract that you have signed with the company;
- public entities, in order to fulfil the related administrative, accounting and tax requirements that derive from legal obligations and the related additional legal requirements that derive from legal obligations.

## Transfer of your personal data to a third Country or an International Organisation

INOXA SRL has assessed that the transfer of your personal country to a third Country or to an International Organisation is not required for the provision of the services that you have requested from the Data Controller, indicated in the contract that you have signed therewith.

# Period of retention of your personal data subject to processing

INOXA SRL will retain your personal data in a format that allows your identification for a period of time not exceeding the provision of the services that you have requested from the company, indicated in the contract that you have signed therewith and the fulfilment of the related administrative, accounting and tax requirements that derive from legal obligations and the related additional legal requirements that derive from legal obligations; thereafter, the Data Controller will destroy or delete said data.

INOXA SRL will retain your personal data in a format that allows your identification until such time as you withdraw your consent, granted for the communication via e-mail of news related to the economic activity of the company and to events organised thereby, also via newsletters.

## Your rights

You, as the data subject, may at any time, by sending an e-mail to the address *info@inoxa.it*, exercise the right to:

- access your personal data subject to processing, pursuant to art. 15 of the Regulation (EU), with the following purpose:
  - 1. to confirm whether your personal data are being processed and, if that is the case:
    - confirm the purposes of the processing of your personal data;
    - confirm the categories of your personal data subject to processing;
    - confirm the categories of recipients of your personal data subject to processing;
    - confirm the period of retention of your personal data subject to processing;
    - confirm the possibility of exercising the right of rectification of your data subject to processing, erasure of your personal data subject to processing or the restriction of the processing of your personal data;
    - confirm the possibility of lodging a claim with the Italian Personal Data Protection Authority;
    - confirm the use of an automated decision-making process and, if that is the case, the logic used;
- to rectify your personal data subject to processing, pursuant to art. 16 of the Regulation (EU), in case they are inaccurate;
- to obtain the erasure of your personal data subject to processing, pursuant to art.17 of the Regulation (EU), unless there is an opposing legal obligation or if it is necessary to process the data for the detection, exercise or defence of a right in court, in case of:
  - subsequent absence of the necessity to process the data for the purposes declared;
  - prior or simultaneous withdrawal of the consent for the processing of the data;
  - prior detection of the unlawfulness of the processing of the data;
  - existence of a legal obligation that dictates their erasure;



- to obtain the restriction of the processing of your personal data, pursuant to art. 18 of the Regulation (EU), in case:
  - the accuracy of the personal data is contested by the data subject, for a period enabling INOXA SRL to verify the accuracy of the personal data;
  - it has been found that the processing of the data is unlawfull and the data subject opposes the erasure of the personal data;
  - it has become necessary to process the data for the detection, exercise or defence of a right in court;
- to obtain your personal data subject to processing in a structured, commonly used and machinereadable format and, possibly, obtain their disclosure to another data controller, pursuant to art. 20 of the Regulation (EU), concerning the processing of personal data related to the communication by e-mail of news related to the economic activity of INOXA SRL and to events organised thereby,

INOXA SRL must assess and provide an appropriate response to any request you may submit for the exercise of aforementioned rights, unless there are justified grounds that forbid it.

#### Your right to lodge a complaint

In case INOXA SRL violates one of your rights, you, as the data subject, have the right to lodge a complaint with the Italian Personal Data Protection Authority by sending your complaint via a filled-in specific form to <u>protocollo@pec.gpdp.it</u>.

## Nature of the communication of your personal data

The communication by you of your personal data to INOXA SRL is contractually mandatory for the performance of the precontractual activities and for the provision of the services that you have requested from the company, indicated in the contract that you have signed therewith, and legally mandatory for the fulfilment of the related administrative, accounting and tax requirements that derive from legal obligations and the related additional legal requirements that derive from legal obligations. In fact, we would like to remind you that, should you refuse to provide said personal data, INOXA SRL will be unable to pursue the purposes mentioned above.

The communication by you of your personal data to INOXA SRL is neither contractually nor legally mandatory as regards the communication by e-mail of news related to the economic activity of the company and to events organised thereby, also via newsletters.

However, we would like to remind you that, should you refuse to provide said personal data, INOXA SRL will be unable to pursue the purposes mentioned above.