

EGA S.R.L.

Elettrolavorazioni e Stampaggio Griglie ed Affini
VIA UGO FOSCOLO, 12
30020 NOVENTA DI PIAVE (VENEZIA)
Tel. +39 042165619 – Fax +39 0421308077
C.F./P.IVA e Reg.Impr. di VE 01460220278
Capitale Sociale € 12.000,00 i.v.
R.E.A.: VE - 158308

PRIVACY

Information notice on the processing of customers and suppliers personal data

Pursuant to articles 13 and 14 of EU Regulation 2016/679 (GDPR)

Dear Customer/ Supplier

Pursuant to articles 13 and 14 of General Data Protection Regulation (EU Regulation 2016/679, the “Regulation” or “GDPR”), EGA S.R.L. (“the Company”), with registered office in Via Ugo Foscolo 12, 30020 Noventa di Piave (VE), in its capacity as Data Controller, gives you the following information about the processing of your personal data.

During pre-contractual measures or by virtue of the contractual relationship (in its capacity as “Contract” or “Supply order”) in place with you as a Customer/ Supplier of the Company, the Data Controller processes personal data provided by you or your employees. Pursuant to the GDPR, any information concerning a natural person (so-called “data subject”) is classified as personal data. With regard to the type of data, the Data Controller processes personal data, contact details, tax and payment data of the companies and identification data (essentially name and surname) and contact details of the companies’ partners, employees, co-workers/ associates.

The Customer/ Supplier ensures to make this information available to data subjects, in order to make them aware of the processing of their personal data.

Data Controller

The Data Controller is EGA S.R.L., with registered office in Via Ugo Foscolo 12, 30020 Noventa di Piave (VE).

Data Protection Officer (DPO)

The Data Protection Officer has not been designated, since it is not necessary according to regulatory conditions.

Purposes of the processing

Personal data as defined above will be processed, without your consent, for the following purposes:

- a) for pre-contractual activities and the acquisition of preliminary data for the purposes of the Contract stipulation;
- b) for the management of the contractual relationship between the Company and the Customer/ Supplier and the fulfilment of the legal obligations and all administrative, operational, managerial, accounting and tax activities (requests, order management, invoicing, payment management, post-sales assistance and support, sending of technical communications, etc.);
- c) for the management of delays or missing payments and/ or for debt protection and collection, directly or through third parties (debt collection agencies/ companies, law firms), for the management of any disputes and/ or breach of contract, for fraud prevention;
- d) for transfer of receivable to authorized companies;
- e) for reward policies and to refuse future contractual relationships, based on the accounting records relating to the punctuality of payments;
- f) for reporting and control within the Quality Management System of the Company, including the management of complaints and nonconformities, as well as any other certificate;
- g) for the fulfilment of the obligations foreseen by laws, regulations, EU regulations and by instructions given by the public authority;
- h) to ascertain, exercise or defend a right in judicial proceedings or whenever the judicial authorities exercise their jurisdictional functions;

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- i) to send communications about Data Controller services and products similar to those already purchased by you as Customer/ Supplier, unless your unavailability to receive them.

Only upon prior and explicit consent of the Client/ Supplier data will be processed:

- j) for commercial purposes, namely communication and/ or sending (via e-mail, sms, email, notifications, telephone contact, newsletters, etc.) of information and commercial offers, advertising and promotional material on products or services offered by the Data Controller, or for market research;
- k) for customer satisfaction surveys aimed at improving the services/ products supplied and conducted within the Company's Quality Management System.

Should the need arise to process your data for purposes other than those indicated above, we will promptly inform you and request your consent if necessary.

Legal basis for the processing

We inform you that the processing of your personal data is based, according to the purposes listed above, on the following legal basis:

- performance of a contract to which the data subject is party or in order to take steps prior to entering into a contract;
- compliance with a legal obligation;
- legitimate interests pursued by the controller;
- consent for purposes under points j) and k).

Mandatory or optional nature of providing data and consequences of a refusal to provide personal data

The provision of data is mandatory for all that is required by legal and contractual obligations and therefore the refusal to provide all or part of them may make it impossible for us to provide the required services and/ or to enter into contracts and carry out other related obligations, as well as to manage reciprocal commercial relations correctly.

The provision of data is optional for the purposes referred to in letters j) and k).

Data processing methods

The processing of personal data is carried out for the purposes mentioned above, using manual, electronic and/or telematic tools, in accordance with local regulations especially with regard to confidentiality and security and in compliance with principles of lawfulness, fairness and transparency and protection of rights of the data subject. Security measures are adopted to avoid the risks of unauthorized access, destruction or loss, unauthorized treatment or treatment not in accordance with the purposes of collection. The treatment is carried out directly by the Data Controller, by its Data Processors and/or people acting under the direct authority of the Controller or of the Processor.

Categories of recipients of the personal data

Without prejudice to communications made in fulfilment of legal obligations, your personal data may be communicated, within the limits strictly relevant to the obligations, tasks and purposes mentioned above and in compliance with current legislation, to the following categories of parties, in their capacity as autonomous data controllers or if necessary appointed by the Data Controller as Processors:

- Public authorities and administrations for purposes connected with the fulfilment of legal obligations or to persons entitled to access under the provisions of law, regulations, EU regulations;
- Trade associations;
- Credit and financial institutions;
- Insurance companies;
- Independent auditors or entities with control functions in the accounting field;
- Debt collection companies;
- Shareholders;
- Consultants/ service providers in the IT, web, tax, administrative, commercial and management fields;
- Companies operating in the transport sector.

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The personal data collected are also processed by the EGA employees, who acts on the basis of specific instructions related to the purposes and methods of the processing.

The updated list of Data Processors may always be requested to the Data Controller.

The data will not be publicly disclosed.

Data retention period

Your personal data will be stored for the time necessary to achieve the purposes related to points a) to i) above. In particular, the data will be treated for a period of time equal to the duration of the contract and for the 10 years following the termination, without prejudice to the cases where the preservation for a subsequent period is required for disputes and objections management purposes, to assert or defend a right in a court of law even by a third party, requests from the competent authorities or pursuant to the applicable legislation.

Furthermore, if you decide to give your optional consent in relation to the commercial and survey purposes under points j) and k), your data will be stored, unless you withdraw your consent, for no longer than is necessary for the purposes for which the personal data are processed.

Data transfer to third countries

Personal data is processed by subjects and stored on servers located within the European Union. The Data Controller does not directly transfer personal data outside the European Union. With reference to some services that the Data Controller uses/ could use (e.g. banking services, cloud services, digital filing solutions, etc.) and/ or if the Data Controller needs to move servers, personal data may be processed in non-EU countries. In such a case, the Data Controller verifies that the transfer in non-EU countries is operated according to the applicable legislative provisions (and specifically the provisions of Chapter V of GDPR concerning the adequacy of the level of protection, appropriate safeguards, binding company rules, derogations for specific situations) and that therefore a level of protection of personal data adequate to that of the European Union is guaranteed contractually, including enforceable and effective data subject's rights.

Rights of data subjects

In your capacity as data subject, pursuant to articles 13, paragraph 2, and 15 to 21 of the Regulation, you may exercise the rights listed below. The exercise of rights is, in principle, free of charge. However, in case of manifestly unfounded or excessive requests (in particular because of their repetitive character), the Company may charge a reasonable fee, taking into account the administrative costs incurred, or refuse to act on the request.

- 1) Where processing is based on the data subject's consent, **to withdraw the consent** at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- 2) **Right of access** – To obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the information as per article 15. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy of the personal data shall not adversely affect the rights and freedoms of others.
- 3) **Right to rectification** – To obtain the rectification of inaccurate personal data and to have incomplete personal data completed.
- 4) **Right to erasure** – To obtain the erasure (“right to be forgotten”) of personal data where the grounds of article 17 apply.
- 5) **Right to restriction of processing** – To obtain the restriction of processing where one of the conditions of article 18 applies.
- 6) **Right to data portability** – To receive the personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent or on a contract and the processing is carried out by automated means.
- 7) **Right to object** – To object at any time to processing of personal data, including profiling, in the following cases:
 - a) the processing is based on article 6, paragraph 1, point e) or f);

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b) personal data are processed for direct marketing purposes.

- 8) **Right to lodge a complaint with a Supervisory Authority**, in particular in the Member State of habitual residence, place of work or place of the alleged infringement, according to procedures and instruction of the authority itself.

To exercise the rights under articles 15 -21 of the GDPR or for questions or information regarding the processing of your data and the security measures adopted, you may contact the Data Controller, sending a specific written request via a registered mail or email to the following addresses:

EGA S.R.L.

Via Ugo Foscolo 12, 30020 Noventa di Piave (VE)

E-mail: privacy@egaelettrolavorazioni.com

CONSENT TO THE PROCESSING OF PERSONAL DATA

Given the complete information contained in this notice submitted pursuant to articles 13 and 14 of EU Regulation 2016/679 of 04/27/2016, acknowledging the processing of the personal data for the purposes described in the notice, in my capacity as a person with the necessary powers for the Company _____,

- in relation to point j) of the information notice

I give my consent

I do not give my consent

for commercial purposes or market research.

Preferred email address for
communications as per point j) _____

Name and surname
(capital letters) and Role _____

Date _____

Stamp and
Signature _____

- in relation to point k) of the information notice

I give my consent

I do not give my consent

for customer satisfaction surveys.

Preferred email address for
communications as per point j) _____

Name and surname
(capital letters) and Role _____

Date _____

Stamp and
Signature _____