

POLICY

Pursuant to and for the purposes of articles 13 and 14 of EU Regulation 27 April 2016 no. 679 General Data Protection Regulation

AFATAC Srl communicates that, for the establishment and management of economic relationships, it is the Controller of your data qualified as personal data pursuant to EU Regulation 2016/679 on personal data protection.

Processing purposes and lawfulness

The collection and processing of personal data is carried out:

- for the conduct of economic activities, pre-contractual activities, the conclusion of contracts, all administrative and accounting activities of **AFATAC Srl**;
- to perform obligations arising from a contract of which the party concerned is a party or to fulfil, before the conclusion of the contract, specific requests of the party concerned;
- for tax compliance and communications to the financial administration;
- for the fulfilment of legal and contractual obligations related to the contract;
- for tax and judicial protection.

and will be subject to processing based on principles of correctness, lawfulness, transparency and protection of privacy and rights.

The personal data that the Data Controller may collect is as follows:

- a) general data (surname, name, address, telephone number, e-mail address) of the legal representative and/or the company representative;

The lawfulness of processing is based on:

- execution of obligations deriving from a contract of which the party concerned is a party or the execution of pre-contractual measures adopted at the request of the same (pursuant to article 6.1, letter b) of the GDPR);
- fulfilment of obligations provided for by law (pursuant to article 6.1, letter c) of the GDPR).

Processing methods

The processing of data for the purposes set out is using either automated, on electronic or magnetic support, or non-automated, on paper, in compliance with the rules of confidentiality and security required by law, the resulting regulations and internal provisions.

Data is always processed in full compliance with the principle of proportionality of processing on the basis of which all personal data and the various processing methods must be relevant and not excessive in relation to the purposes pursued.

Stored data is protected by appropriate security measures, so as to reduce the risk of accidental loss or unauthorized access or processing that is not permitted or not in accordance with the purposes indicated.

Place of processing

Data is processed and stored at the headquarters in via Caluso 41 / A - 10035 MAZZE' (TO). It is also processed, on behalf of the Company, by professionals and/or companies in charge of carrying out management and administrative-accounting activities.

Obligatory nature of the conferment of data and consequences of eventual refusal to conferment

The conferment of data is obligatory for all that is required by legal and contractual obligations and therefore any refusal to provide it in whole or in part may give rise to the impossibility for **AFATAC Srl** of executing the contract or correctly fulfilling the obligations related to the contract.

Data communication

Without prejudice to communications made in compliance with legal and contractual obligations, all data collected and processed may be communicated, exclusively for the purposes specified above, to:

- Public bodies (tax offices,...);



- Insurance companies and credit institutions;

In addition, in handling your data, it may be acquired by the following categories of internal delegates/assignees, external managers identified in writing and that have been provided with specific written instructions and/or other parties:

- Employees of the Company;
- Professionals or service companies for company administration and management and for judicial protection, which operate on behalf of our company.

Transfer of data abroad

The transfer of your personal data to non-EU third countries is not foreseen.

Data retention period:

The data provided will be stored in our archives for 10 years from the end of the contractual relationship, without prejudice to any obligations deriving from the law.

Rights of the party concerned

With regard to personal data, the party concerned may exercise the rights provided for in Chapter III of EU Regulation 2016/679 (a copy of which is annexed) within the limits and under the conditions set out in articles 15 - 23 of the aforementioned Regulation. In particular, **AFATAC Srl** guarantees and recognizes the following rights to parties concerned:

- the right to access personal data in paper and/or electronic archives;
- the right to request correction, updating and cancellation, if incomplete or erroneous, and to oppose processing for legitimate and specific reasons;
- the right to obtain the correction of inaccurate personal data without unjustified delay. Taking into account the purposes of processing, the party concerned has the right to obtain the integration of incomplete personal data, also by providing an additional declaration;
- the right to obtain the cancellation of related personal data without unjustified delay for one of the reasons set out in article 17, paragraph 1 of the Regulation;
- the right to obtain the limitation of processing for one of the hypotheses referred to in article 18, paragraph 1 of the Regulation;
- the right to file a complaint with the Control Authorities, and to exercise the other rights recognized by the applicable regulations.

The party concerned may exercise related rights by contacting the Data Controller following the contact details indicated below, without prejudice to the obligatory obligations provided for by the law in force at the time of the request that may not allow the contract to be executed or to correctly fulfil all the obligations related to the contract.

Data Processing Controller

The rights in question may be exercised, also through an assignee, by sending a request to the **Data Controller** at the HQ of the Company in via Caluso 41/A – 10035 MAZZE' (TO) - Tel. 011 9830252 or the following e-mail: afatac@afatac.com.

The Data Controller is **AFATAC Srl**, via Caluso 41/A – 10035 MAZZE' (TO) - Tel. 011 9830252 represented by the legal representative. E-mail afatac@afatac.com

The complete text of EU Regulation 2016/679 (GDPR) is available on the website of the Control Authority www.garanteprivacy.it.

Mazzè, 25/05/2018

AFATAC Srl