

## PRIVACY STATEMENT

### pursuant to article 14 EU Reg. 679/2016

To our Customers,

We wish to inform you that EU Reg. 679/2016 deals with the protection of natural persons with regard to the processing of personal data. According to the regulation, data must be processed lawfully, fairly and in a transparent manner, safeguarding your privacy and your rights.

Pursuant to article 13 EU Reg. no. 679/2016, we provide you with the following information:

- a)** Data may be processed by the data controller by automated means and/or through the collection of paper documentation, for the following purposes:
- to set up and handle the business/professional relationship and organizational operations connected with it;
  - to provide the services/purchase the goods covered by the business/professional relationship entered into with the data controller;
  - to deal with related precontractual, contractual, administrative, accounting, tax and legal obligations.
- b)** the conferment of data is mandatory for the purposes described under letter **a)**, and failure to provide such data may make it impossible for a business/professional relationship to be set up; the processing is not based on the suppositions described in art. 6, paragraph 1, lett. f) of EU Reg. no. 679/2016;
- c)** your personal data will be processed by subjects who have been specifically instructed by the data controller to act as data processing supervisors and/or data processors; these subjects will process your data only when necessary to pursue the purposes for which they were furnished and solely in the performance of the tasks assigned to them by the data controller, undertaking to handle only the data necessary to perform the tasks in question and to carry out only those operations necessary for this to be achieved.
- In addition, your personal data may be passed on, for the purposes described in paragraph **a)**, to:
- external companies or professional advisers who perform specific tasks on behalf of the data controller (including, for example, but not limited to, the processing of data, assistance, consultancy, in connection with administrative, accounting, tax, legal or legislative matters, the running/maintenance/implementation of company computer systems, etc...) only when the transfer of your personal data is necessary, or at least useful, for the purposes described in paragraph **a)** above;
  - legal firms and lawyers, in order to safeguard contractual rights;
  - banks and, when necessary, finance, leasing, debt collection, credit protection and assignment companies and agencies, for the handling of economic transactions;
  - central and secondary government bodies, public organizations and other institutions, in order to satisfy legal obligations.
- c1)** the Data Controller may transfer personal data to another country or to an international organization; in such circumstances, the Data Controller undertakes to process the data only if appropriate guarantees have been given;
- c2)** data will not be transferred to other third parties, unless your express consent is first obtained.
- Your personal data will not be disseminated.**
- d)** Data will be kept for the period strictly necessary to achieve the aforementioned purposes and to comply with legislative obligations applying in the sector; the storage period established will depend on the business/professional relationship and the administrative, accounting and tax obligations applying.
- e)** Personal data conferred will never be processed in order to carry out any automated decision-making process (referred to as profiling).
- f)** Should it prove necessary for personal data conferred to be processed for purposes differing from or additional to those described above, the Data Controller will provide you with information regarding the purposes in question and any other relevant details.



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Taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing, the Data Controller has, both at the time of establishing the means for processing and at the time of the processing itself (referred to as risk analysis - *accountability*), implemented appropriate technical and organizational measures, which are designed to implement data-protection principles in an effective manner and to integrate the necessary safeguards into the processing in order to meet the requirements of EU Reg. no. 679/2016 and to safeguard the rights of the data subject.

In this regard, personal data will be processed for purposes connected with and/or instrumental to the business/professional relationship that has been set up, in keeping with the objectives described above.

Data will be processed with the implementation of methods and tools that are capable of guaranteeing security (art. 24, 25 and 32 EU Reg. no. 679/2016) and by means of automated processes and non-automated means (paper-based filing), applying all the technical and organizational measures to ensure a level of security appropriate to the risk, and thereby guaranteeing the ongoing confidentiality, integrity, availability and resilience of processing systems and services.

We inform you that, in accordance with the combined provisions of articles 4, point 11 and art. 6, paragraph 1, lett. b) EU Reg. 679/2016, the processing of data conferred is necessary (and therefore legitimate) for the performance of the business/professional relationship existing between the Parties and that by receiving this privacy statement you will be considered as having given your consent by a clear affirmative action to the aforementioned processing (art. 7 EU Reg. 679/2016).

The **Data Controller** is: CLAL Srl with registered office in Modena – Viale Caduti in Guerra no. 1 – Tax code 00042740290, VAT reg. no. 02331000360 – Tel. 059.214171 Mail [privacy@clal.it](mailto:privacy@clal.it) – [amministrazione-interna@pec.clal.it](mailto:amministrazione-interna@pec.clal.it)

In accordance with art. 28 of EU Reg. no. 679/2016, the Data Controller may use third parties to process data on its behalf, formally appointed as data processors. A full, up-to-date list of the data processors appointed will be sent to you by the Data Controller upon request, at the addresses indicated above.

In accordance with art. 29 of EU Reg. no. 679/2016, the Data Controller may benefit from the services of anyone who has been authorised by it and/or by the appointed data processor; these subjects will be instructed accordingly.

The Data Controller also informs you that:

- g)** the data subject is entitled to obtain from the Data Controller access to his personal data, their rectification or erasure or the restriction of processing operations regarding him or to object to such processing and he also has the right to portability of the data (art. 15, art. 16, art. 17, art. 18, art. 20 EU Reg. no. 679/2016); by exercising the right of access, the data subject is entitled to obtain confirmation from the data controller as to whether or not his or her personal data are being processed, whilst the right to data portability entitles the data subject to request personal data in a structured, commonly used and machine-readable format, or to transmit those data from the original data controller to another (see WP 242 dated 13.12.2016);
- h)** the data subject is entitled, when data are processed in the manner envisaged in article 6, paragraph 1, letter a) or article 9, paragraph 2, letter a), to withdraw his consent at any time without affecting the lawfulness of processing based on consent before its withdrawal;
- i)** the data subject is entitled to make a claim to a supervisory authority;
- j)** the data subject is entitled to be informed, by the Data Controller, who is obliged to take the necessary measures without undue delay, of any personal data breach that is likely to result in a high risk to the rights and freedoms of natural persons (art. 34 UE Reg. no. 679/2016);

The Data Controller undertakes to provide the aforementioned information in keeping with the following terms:

- within a reasonable period from the collection of the personal data, and at the latest, within one month, bearing in mind the particular circumstances in which the personal data are being processed;
- if the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject; or
- if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.



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The full text of the articles from EU Reg. no. 679/2016 relating to your rights (articles 15 to 23 inclusive) can be consulted at any time at the following link found on the website of the Italian Data Protection Supervisor:

[www.garanteprivacy.it](http://www.garanteprivacy.it)

or, alternatively, you can ask for a copy from the Data Controller, sending a message to the addresses indicated above.

Modena, May 2018

CLAL Srl