

Dear Sir/Madam

The undersigned: **STILOLINEA SRL**

Registered office: Via Toscana 26 – 10099 SAN MAURO TORINESE (TO)

In accordance with EU Regulation 2016/679 "European Regulation" and with the Italian regulations applicable to this sector, as Data Controller of personal data, we inform you that we process your personal data at our company's facilities in full respect of the aforementioned laws and guarantee respect for fundamental freedom and dignity of the interested party, and specifically protecting his/her privacy and personal data. Please note that this privacy notice applies to personal data provided by the party concerned or his/her representatives and any data that will be requested in the future and needed for the purposes indicated below and obtained directly from them or through systems where the party concerned may provide such information and subsequently be contacted by the undersigned.

The specific nature of some data processing or the requested data itself, pursuant to provisions of relevant laws, involves requesting prior written consent from the interested person. The type of data processing or purpose that requires this explicit consent will be defined in a designated section of this notice.

Pursuant to Art. 13 and 14 of the Regulation, we hereby provide the following information:

▪ **Data processing procedure**

Data processing may or can be carried out through use of paper-based medium and/or computer systems and relevant electronic equipment (including remote ones with appropriate protection and security systems) by persons specifically appointed and trained on security and data processing, for the purposes. Information regarding additional data processing for different purposes will be provided in a separate privacy policy with relevant consent, if any, in accordance with mandatory regulations.

▪ **Purposes**

- A Management for administrative, accounting and tax purposes of the company  
(invoicing, project management, etc.)
- B Operations management and internal / external logistics  
(delivery and/or pick-up of goods or vehicles, communications regarding the case's or the project's status)
- C Management of the task / service / order / assigned processing  
(quotation, order fulfillment, order verification, implementation / production)
- D Managing dispute, if any, between the parties  
(complaints, contractual breaches between the parties)
- E Archiving technical / administrative documentation  
(in relation to legal obligations, tax and contract record-keeping, contractual and warranty communications)
- F Promotion of services, incentives, discounts to customers or interested parties  
(marketing communications through mailing list to inform customers and interested parties of events, activities and promotions being offered)

▪ **Communication of personal data**

The data we have in our possession will be processed by our own company's employees (persons-in-charge and managers) depending on roles they have within the company, with the aim of implementing activities under the purposes listed above and based on the transactions between the parties. The company also employs third parties for specific activities that require specific professional figures and/or technical personnel and involve data processing. These persons are appointed as data processing external managers and therefore subject to the obligations pursuant to current legislation applicable to them.

The recipient categories are the following:

**INTERNAL**

Company employees or collaborators with different types of contract under direct supervision by the owner

**EXTERNAL**

Tax consulting firms (accountants, tax practitioners, etc.)

Partner companies for additional processing, if any, of assigned orders

Communication to third parties shall be made only if strictly needed to fulfill the customer's request and correctly implement the assigned task or in accordance with legal obligations (e.g. book-keeping and company tax records). Accordingly, not all categories of persons/companies mentioned can process data, but only internal employees or third parties assigned to specific mandatory data processing.

▪ **Personal data transfer to a different country or international organizations**

The data controller does not transfer data to a different country or international organizations for the activities he/she performs that involve personal data processing.

▪ **Obligatory/Non-obligatory communication of data**

Personal data processing can only be allowed after the interested person has provided his/her personal data.

This communication of data may be optional or obligatory under the provisions of applicable laws for the purposes of data processing.

Due to the "necessity" of data (and this excludes requesting data that are not strictly necessary), we inform the interested party that his/her refusal to provide his/her data for the purposes mentioned will mean that relevant data processing cannot be implemented, and therefore, relevant services or specific legal obligations cannot be performed, without prejudice to his/her giving consent to the use of the data in the following cases.

- **Data retention**

Data retention, without prejudice to the interested party exercising his/her rights as shown below, is extended strictly for a period of time needed to complete the order, task or service requested, as well as data retention, if any, for warranties or as required by the Italian or European laws (E.g. tax record-keeping). Data, including sensitive information, that is no longer necessary or needed to be retained by virtue of the regulations or so as to protect the interested party will be destroyed (or rendered unusable) or returned, in case of original documents, without keeping any copies of them. Data retention for certain purposes (F) beyond the period is allowed only upon explicit consent from the interested party and until receipt of a request for revocation thereof or regulatory provisions that modify the use of the data are enforced. Further information on retention periods for various cases may be requested from the data controller and his/her contact persons through the communication channels described in this privacy notice.

- **Profiling and automated processes**

Data processing is carried out without using automated systems or processes such as to make decisions that will affect data processing and legitimate interests of the interested party, no profiling is done on the interested party.

- **Data controller**

Under the EU Regulation, the company designated as Data Controller and to whom requests, if any, may be forwarded and exercise rights guaranteed to the interested party under Art. 15 to 22 of EU Regulations 2016/679 and applicable Italian regulations, is:

**STILOLINEA SRL**

*Via Toscana 26 – 10099 SAN MAURO TORINESE (TO)*

*Tel. 011 2236350 E-Mail. [info@stilolinea.it](mailto:info@stilolinea.it)*

- **Managers and/or contact persons**

The person(s) acting as contact person(s) for information requests and for the exercise of the rights listed below, is/are:

***Data privacy manager (to be included in the request)***

- **Right of the interested party (Art. 15 to 22 EU Regulation)**

The interested party may exercise the following rights, without prejudice to any specific obligation to which the company is required to comply pursuant to relevant Italian laws and the EU Regulation as well as other legislative provisions governing the management of specific personal data:

1. The interested party has the right to obtain confirmation of whether his/her personal data exists or not, even if it is not yet registered, and communication thereof in intelligible form.

2. The interested party has the right to obtain information:

a) on the personal data's origin and their categories;

b) on the purposes and methods used for data processing, as well as the duration of data retention;

c) on the logic applied when processing data with electronic instruments;

d) on identification details of the data controller, managers and designated representative;

e) on parties or categories of parties in Italy, the European Union or other countries, such as managers or persons-in-charge, to whom the personal data may be communicated or who may learn of them, and to receive information about adequate guarantees for data transfer and processing.

3. The interested party has the right to obtain:

a) update, correction or, when concerned, integration of data;

b) cancellation (right to be forgotten), transformation of the data into anonymous form or blocking of data processed, including those whose retention is unnecessary for the purposes for which the data were collected or subsequently processed, without prejudice to legal requirements or obligation to protect the party concerned, and specifically, in case of illegal data processing;

c) certification that the operations referred to in letters a) and b) have been acknowledged, and as regards to their content, those to whom the data have been communicated or sent, except for cases in which such fulfillment proves impossible or involves using means that are clearly disproportionate to the right.

4. The party concerned has the right to oppose or to limit, in whole or in part:

a) to the processing of his/her data on legitimate grounds even though they are relevant to the purpose for which the data was collected;

b) to the processing of his/her data with automated processes or which came from profiling (without prejudice to contractual obligations stipulated between the parties), more specifically, for marketing purposes and the like.

5. Moreover, the interested party has the right to:

- a) make a formal complaint to a supervisory authority (more information on this on [www.garanteprivacy.com](http://www.garanteprivacy.com));
- b) to receive available information on the data's origin if it has not been collected directly from the interested party;
- c) receive a copy of the data kept within the limits of the protection of the rights and freedom of others;
- d) request data portability, if the kind of data processing makes it technically feasible.

Further information can be obtained from the data controller or by consulting the articles of the laws that have been mentioned.

▪ **Consent by the party concerned (Art. 6, 7 and 9 of EU Regulation)**

With the privacy notice, the undersigned company, as data controller, pursuant to Art. 13 and 14 (available on hard copy and can be viewed on the company's website), asks you to give your consent to data processing for individual purposes that need your authorization, described below, by signing this document. The remaining purposes that do not need explicit authorization are to be considered as having implicit consent when the party concerned provides his/her data (mandatory for the execution of transaction/contract between the parties and in case of non-consent or if the data is not provided, proceeding with the transaction/contract will be impossible).

By signing, the party concerned also states to have read and understood the contents of the privacy notice and the recognized rights under the mandatory regulations.