

## INFORMATION ON THE PROCESSING OF PERSONAL DATA BUSINESS PARTNERS

Pursuant to art. 13 of Regulation (EU) 2016/679 of 27/04/2016

Pursuant to article 13 of Regulation EU 2016/679 of 27/04/2016, hereinafter called **GDPR** (General Data Protection Regulation), Gavinox S.r.l. – Società Unipersonale, with registered office in Via Ferrovia, 14/A – 31020 SAN FIOR (TV), as controller of the processing of personal data, would like to inform you with reference to the following:

### Data controller and Data protection officer

Controller of the processing is Gavinox S.r.l. – Società Unipersonale, with registered office in Via Ferrovia, 14/A – 31020 SAN FIOR (TV).

Dr. Silvia Gorini of STUDIO LEGALI ASSOCIATE – WILDSIDE HUMAN FIRST with registered office in Piazza dei Martiri 1943-1945 n.1/2, 40121 Bologna, is the data protection officer and can be contacted at the following email address: [dpo@gavinox.it](mailto:dpo@gavinox.it).

### Purposes of the processing

The personal data you provide will be exclusively processed for the following purposes:

- drafting and performance of a contract and of all the activities related to it, such as invoicing, credit protection and administrative, management, organizational and functional services connected to the performance of the contract;
- fulfilment of the obligations provided for by law, regulations, applicable law and other provisions issued by authorities vested by law and by supervisory and control bodies;
- possible protection in trials regarding rights of the Data controller;
- sending of newsletters for updates on the activities of the Company and the Gabrielli Group;
- sending of personalized notices on the basis of previous purchases or expressions of interest.

### Mandatory or optional nature of providing data and consequences of any possible refusals to provide personal data

The data required for the purposes of the above letters a), b) and c) are to be peremptorily provided for the compliance of the obligations laid down by law and/or the entering or performance of a contract and the provision of the required services. Therefore, should you refuse, even partially, to provide such data, it may be impossible for the Supplier to establish and manage the relationship itself and to provide the required service.

Providing the personal data required for the purposes of the above letters d) and e) is optional; therefore, should you refuse to provide these data, implementing the activities described in said letters will not be possible. The legal basis for the purposes of letters d) and e) is the express consent which may at any time be revoked either through the unsubscribe process or by contacting the Data controller.

### Methods of data processing

The processing of personal data is carried out by means of the operations indicated in art. 4 no. 2) GDPR, for the aforementioned purposes, both on paper and computer, by means of electronic or automated tools, in compliance with current legislation in particular regarding confidentiality and security and in compliance with the principles of correctness, lawfulness and transparency and protection of the Customer's rights. Processing is directly carried out by the controller's organization, by its managers and/or appointees.

### Communication and Disclosure

Your personal data may be communicated, within the limits strictly pertinent to the obligations, duties and purposes referred to above, and in compliance with the law in force on the matter, to the following categories of parties:

- parties to whom the communication must be made in order to fulfil or to require fulfilment of specific obligations provided for by the law, by regulations and/or by the Community legislation;
- companies belonging to the Controller's Group, i.e. parent companies, subsidiaries or associates pursuant to Art. 2359 of the Civil Code, which act as processors or for administrative accounting purposes (purposes connected to the performance of activities of internal organizational, administrative, financial and accounting nature, in particular, functional to the fulfilment of contract and pre-contract obligations);
- external natural and/or legal persons that supply essential services to the Controller's activities for the purposes referred to in no. 1 above (e.g. call centres, suppliers, consultants, companies, bodies, professional firms). Such parties shall operate as processors.

We would like to remind you that the data may be conveyed to the companies of the Group on the basis of the services and products offered by each company in order to offer better service.

The personal data shall in no way be disclosed.

### Period for the which the personal data are retained

Personal data shall be kept for the entire period expressed by the contract agreed upon with the Data Controller. Once such period is concluded the data will be kept for the fulfilment of the terms provided for by law for the retention of administrative documents, after which they will be deleted. Should consent be revoked, personal data related to newsletters and profiling will be deleted within a reasonable period of time and in any case no later than six months from the registration of the revocation of consent.

**Transfer of data**

Personal data are stored on servers located within the European Union. It is understood that the Controller, should it be necessary, will also have the power to move the servers out of the European Union. In such case the Controller ensures that transfer of data out of the EU shall take place in compliance with the provisions of applicable law, subject to the stipulation of standard contract clauses provided for by the European Commission.

**Rights of data subjects**

As a data subject, you have the right referred to in art. 15-21 GDPR and right to access your personal data, order the rectification or restriction, update if incomplete or wrong and erase if collected in breach of the law, as well as oppose to their processing with the exception of legitimate reasons of the Controller.

To exercise the right referred to in art. 15-21 of the GDPR or for questions or information on the processing of your data and on the security measures adopted, you can send your request to our company to the following address:

**Gavinox S.r.l. – Società Unipersonale****Via Ferrovia, 14/A - zona industriale – 31020 SAN FIOR (TV)****Tel.: +39. 0438.403113 - Fax: +39. 0438.403130****E-mail: [privacy@gavinox.it](mailto:privacy@gavinox.it)**

We would like to inform you that Data Controller has appointed a Controller of the providing of personal data (DPO) in the person of Dr. Silvia Gorini who can be contacted at the following email address [dpo@gavinox.it](mailto:dpo@gavinox.it) or by mail at Dr. Silvia Gorini, Piazza dei Martiri 1943-1945 no.1/2 – 40121 Bologna (Italy).

Signing

I declare that I have read the information and specifically express

CONSENT FOR THE PURPOSES REFERRED TO IN LETTER D) REGARDING THE SENDING OF NEWSLETTERS

Date \_\_\_\_\_ signature \_\_\_\_\_

CONSENT FOR THE PURPOSES REFERRED TO IN LETTER E) REGARDING THE SENDING OF PERSONALIZED NOTICES BASED ON PROFILING

Date \_\_\_\_\_ signature \_\_\_\_\_