



## INFORMATION TO DATA SUBJECTS ON PERSONAL DATA PROCESSING

Pursuant to Section 13 of Italian Legislative Decree No. 196 of 30 June 2003 (hereinafter referred to as the Personal Data Protection Code) and pursuant to Article 13 of Regulation EU 2016/679 (hereinafter referred to as Regulation or GDPR), providing for the protection of natural persons and entities with regard to the processing of personal data, we hereby give you the information as required by the aforementioned legislation.

### DATA CONTROLLER

The Data Controller is I COTTINFORNO S.R.L., with Registered Office at Via Cavicchiolo 8 – 43048 Sant'Andrea Bagni (PR), Italy, VAT code 01548420346, through its Legal Representative Mr. Antonio Vergalli.

You may contact at any time the Data Controller by e-mail writing to the address [info@icottinfosrl.it](mailto:info@icottinfosrl.it) or by phone calling number +39 0525/430493.

### PURPOSES OF DATA PROCESSING

The personal data of natural persons, legal persons, sole traders and/or self-employed workers, which you have freely provided, are required for the business relationship established with I Cottinforno S.r.l. and shall be processed lawfully and fairly for the purposes given below:

- For purposes that are instrumental to the exercise of rights and compliance with the obligations provided for by the supply contract, as well as for management purposes;
- To comply with all statutory obligations regarding the keeping and storing of accounting documents, including the storing of your datasets in the enterprise management systems used;
- To manage any complaints and/or disputes that may arise;
- To send communications regarding the service performance

The processed data are updated, pertinent, complete and not exceeding the aforementioned purposes for which they were collected and later processed.

### PROCESSING METHODS

Your personal data may be processed with the following methods:

- Outsourcing of accounting processing operations
- Data entry in the company's enterprise management systems
- Data collection through electronic or telecommunication means
- Manual processing through paper document archives

Personal data are processed so as to ensure the security and confidentiality of such data. Appropriate prevention and protection systems are used and constantly updated and verified in terms of reliability.

### LEGAL BASIS OF DATA PROCESSING

The legal basis of the processing of your personal data is the contract that is finalized by and between the parties.

It is mandatory for you to provide the relevant data in order for the Data Controller to supply the requested products to you and to comply with the obligations provided for by the applicable law and directly linked to the contract in force. Any failure to provide the relevant data shall entail the impossibility for the Data Controller to carry out the required processing and non-compliance with the contractual obligations.

### LEGITIMATE INTERESTS PURSUED BY THE DATA CONTROLLER

The legitimate interests pursued by the Data Controller are the obligation to fully comply with the obligations and



commitments provided for by the contracts in force between the parties. Pursuant to Article 6 of the Regulation, the lawfulness of data processing is based on explicit consent given by the data subject to the processing of his or her personal data in writing and on the fact that it is necessary to perform a contract which the data subject is a party to.

#### **DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES**

To pursue the aforementioned purposes, the supplied personal data shall be disclosed only to those in the Company organization who need to be aware of them to carry out their jobs. The people whom personal data are disclosed to, in their capacity as persons in charge of data processing, have been adequately trained on the proper processing methods and, especially, on the procedures to be implemented in order to prevent any loss, accidental destruction, tampering and unauthorized processing of the data, as well as any unauthorized access thereto.

Moreover, the data may be used by third-party firms engaged in ancillary activities on behalf of the Data Controller:

- Companies, advisors or other entities providing assistance, consultancy or other services to the Data Controller of an accounting, administrative, tax, legal, insurance and financial nature, after receipt and acceptance of a letter of engagement from us, laying down their obligations in terms of confidentiality and security in personal data processing;
- IT consultants, to the extent required in order for them to perform their tasks, after receipt and acceptance of a letter of engagement from us, laying down their obligations in terms of confidentiality and security in personal data processing;
- Banks and financial institutions that need the pertinent data to carry their activities regarding fulfilment by us of the contractual obligations we have undertaken towards you;
- Public administration bodies to carry out their institutional functions in accordance with the limits laid down by the law or applicable regulations;
- Third-party service providers that need to have the data disclosed to them in order to provide the services covered by the relevant the contract (for example, forwarding or shipping agents).

Your data may be disclosed, subsequent to audits (if so requested), to all competent auditing bodies in charge of verifications and controls on full compliance with the law.

Your personal data shall **NOT** be disclosed and shall never be published, displayed or made available to unidentified parties.

#### **STORAGE PERIOD:**

The collected personal data shall be stored by the Data Controller for a period of time as necessary to pursue the purposes set forth above and for ten years of the termination of the relationships in force, without prejudice to any longer storage period as required for the exercise or defence of the Data Controller's rights in court.

#### **EXISTENCE OF AN AUTOMATED DECISION-MAKING PROCESS:**

There is no automated decision-making process in force.

#### **TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES:**

The Data Controller shall not transfer your data to any third country or international organization.



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**RIGHTS OF THE DATA SUBJECT:**

The rights of data subjects pursuant to Regulation (EU) 2016/679 can be summarized as follows:

<b>RIGHTS OF THE DATA SUBJECTS</b>	
<b><i>Right of access</i></b>	In accordance with Article 15 of the GDPR, the data subject shall have the right to obtain access to his/her personal data.
<b><i>Right to rectification</i></b>	In accordance with Article 16 of the GDPR, the data subject shall have the right to obtain rectification of his/her personal data.
<b><i>Right to erasure</i></b>	In accordance with Article 17 of the GDPR, the data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her.
<b><i>Right to restriction of processing</i></b>	In accordance with Article 18 of the GDPR, the data subject shall have the right to obtain from the controller restriction of processing.
<b><i>Right to object</i></b>	In accordance with Article 21 of the GDPR, the data subject shall have the right to object to processing of personal data concerning him or her.
<b><i>Right to data portability</i></b>	In accordance with Article 20 of the GDPR, the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller.
<b><i>Right to consent withdrawal</i></b>	In accordance with Article 7 paragraph 3 of the GDPR, the data subject shall have the right to withdraw his or her consent at any time.
In any case, the data subject shall always have the right to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali, the Italian Data Protection Authority), pursuant to Article 77 of the GDPR, if the data subject considers that the processing of personal data relating to him or her infringes the applicable legislation.	



All requests shall be sent in writing by mail or e-mail to the Data Controller, to the addressed given above.

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GIVING CONSENT  
(SECTION 23 OF ITALIAN LEGISLATIVE DECREE 196/2003 AND ARTICLE  
7 OF REGULATION (EU) 679/2016)

I, the undersigned, \_\_\_\_\_

Hereby state that I have received a copy of the information to data subjects from the Data Controller pursuant to Section 13 of Italian Legislative Decree 196/2003 and to Regulation (EU) 679/2016 and that I have carefully read it; by signing this

I GIVE MY CONSENT       I DO NOT GIVE MY CONSENT

To the processing of my personal data by the I COTTINFORNO S.R.L. Company

Date, \_\_\_\_\_

Legible signature

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