

***Information pursuant to and for the purposes of art. 6, EU Regulation no. 679/16, art. 13-14, EU Reg 2016/679 (hereinafter the GDPR), as well as art. 13 and 23 Decree Law 196/2003 (hereinafter the Privacy Code)***

The new EU Regulation for the protection of personal data no. 679/16 and Decree Law 196/03 aim to guarantee that your personal data is processed with respect for fundamental rights and freedoms and for personal dignity, especially with regard to confidentiality and personal identity. It is therefore our duty to inform you about our policy with regard to privacy.

## **Data Controller**

The Data Controller is **TECNOSICUREZZA SRL**, with registered office in San Giovanni Lupatoto (VR), in via Cesare Battisti 276, VAT number 01644560235, in the person of its legal representative Mr. Franco Miller; email: [info@tecnosicurezza.it](mailto:info@tecnosicurezza.it), tel: +39 045 8266470, fax +39 045 8266469.

The Data Controller uses internal and external appointees for the processing, for the achievement of the purposes specified hereafter (technical purposes related to the provision of the service and supplies and commercial purposes).

The updated list of the Data Processors, the staff appointed for the processing, the Co-Data Controllers and the recipients of the data is kept at the registered office of the Data Controller.

## **Types of data Collected**

The Data Controller processes personal data, identifying data (such as name, surname, company name, address, telephone number, email address) - hereinafter "Personal Data" or also "data" - that you have communicated during the preparation and conclusion of contracts for the services and supplies offered, following the completion of the form on the site [www.tecnosicurezza.it](http://www.tecnosicurezza.it) to make a request for information about the services or supplies offered or following subscription to the Newsletter service.

Amongst the Personal Data collected by the Data Controller, either autonomously or through third parties, there are: cookies, usage data, emails, various types of data, first name, last name, telephone number, company name, address and province.

Full details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific information displayed before the data is collected.

Personal Data may be freely provided by the Data Subject or, in the case of usage data, collected automatically while browsing the site [www.tecnosicurezza.it](http://www.tecnosicurezza.it).

The provision of data for the purposes referred to in Point A) of the section "Purposes of the processing of collected data" is mandatory. In its absence, we will not be able to guarantee you the requested services or supplies.

The provision of data for the purposes referred to in Point B) of the section "Purposes of the processing of collected data" is optional however. You can therefore decide to not provide any data or to later refuse the processing of data that had been provided. In this case, you will not be able to receive newsletters, commercial communications and advertising material regarding the services offered by the Controller.

However, you will continue to be entitled to the services referred to in Point A).

Data Subjects who have doubts about what data is mandatory are encouraged to contact the Data Controller.

Any use of cookies - or other tracking tools - by this site or by third party service providers used by this site, unless otherwise specified, is intended to provide the service requested by the Data Subject, in addition to the additional purposes described in this document and in the cookie policy.

The Data Subject assumes the responsibility for the Personal Data of third parties obtained, published or shared by this application, and guarantees having the right to disclose or disseminate such data, releasing the Data Controller from any liability to third parties.

## **Methods and place of the processing of collected data**

### **Processing methods**

Pursuant to art. 5 of the GDPR the processing of your data will be based on the principles of correctness, lawfulness and transparency and can also be carried out through automated procedures designed to store, manage and transmit them (through the operations indicated in art. 4 no. 2 of the GDPR and art. 4 of the Privacy Code) and will take place through suitable tools to ensure security and confidentiality through the use of appropriate procedures that avoid the risk of loss, unauthorised access, illicit use and dissemination.

Your Personal Data is processed in both paper and electronic form.

The data may be disclosed to other employees and associates of the Data Controller in their capacity as staff appointed and/or responsible for the processing of the same, and it can also be viewed by the external party which oversees our computer system and that our facility has appointed external manager; your data may also be communicated to companies and/or professional offices which provide outsourced assistance, consultancy or collaboration to the Data Controller, on accounting, administrative, fiscal, legal, tax and financial matters to public administrations for the performance of official duties within the limits prescribed by law or regulations, and to third party service providers where the disclosure is necessary for the performance of services covered by the contract, if an assignment was entrusted to us requiring their intervention.

The updated list of Data Processors can always be requested from the Data Controller.

Without the need for express consent pursuant to art. 6, para.1 of the GDPR, as well as art. 24 of the Privacy Code, the Data Controller may communicate your data for the purposes referred to in the following Point A) "Purposes of the processing of collected data" to Supervisory Bodies and Judicial Authorities, as well as to those parties to which the communication is mandatory by law for the accomplishment of the said purposes.

Your Personal Data will not be disclosed in any other form.

### **Legal basis of processing**

The Data Controller processes Personal Data relating to the User if one of the following conditions is satisfied:

- the Data Subject has given consent for one or more specific purposes;
- the processing is necessary for the execution of a contract with the Data Subject and/or for the execution of pre-contractual measures;
- the processing is necessary for compliance with a legal obligation to which the Data Controller is subject;
- the processing is necessary for the performance of a task carried out in the public interest or for the exercise of official authority vested in the Data Controller;
- the processing is necessary for the pursuit of the Data Controller's legitimate interest or that of third parties.

In any case, it is always possible to ask the Data Controller to clarify the actual legal basis of each processing and in particular to specify whether the processing is based on the law, a provision of a contract or is necessary to enter into a contract.

## Place

Personal Data is processed at the Data Controller's operational offices and in any other location where those involved in the processing are to be found.

The data may also be communicated to the foreign offices of TECNOSICUREZZA SRL, inside or outside the EU, which, as Data Processors, have signed an agreement with our Company. At these offices - with particular attention to locations established in countries outside the EU - precise operating instructions have been given through contractual clauses that guarantee that the data will be processed in accordance with the principles established in EU Reg. no. 679/16 in the third country in question too.

If your Personal Data were to be transferred to a country other than that in which you are located, as the Data Subject you have the right to obtain information regarding the legal basis of any transfer of data outside the European Union or to an international organisation subject to international public law or made up of two or more countries, such as the UN, as well as regarding the security measures taken by the Data Controller to protect the data.

If one of the transfers described above takes place, the User can refer to the respective sections of this document or request information from the Data Controller, contacting such by using the details provided at the start of the document.

## Retention period

The Data Controller will process the Personal Data for the time necessary to fulfil the purposes for which it was collected and in any case:

- for no more than 10 years from the termination of the relationship for the purposes of service and obligations imposed by the law, Point A) of the section "Purposes of the Processing of Collected Data"
- for a maximum period of 24 months where the processing is carried out solely for marketing purposes, Point B) of the section "Purposes of the Processing of Collected Data"

At the end of the retention period the Personal Data will be deleted. Therefore, upon the expiry of this term, the right of access, deletion, correction and the right to Data Portability may no longer be exercised.

## Purposes of the processing of collected data

Your Personal Data are processed:

**A)** without your express consent (pursuant to art. 6, para. 1 of the GDPR, and art. 24 of the Privacy Code) for the following service or supply purposes:

- entering into contracts for the services and supplies of the Data Controller;
- fulfilment of pre-contractual, contractual and fiscal obligations deriving from existing relationships with you;
- fulfilment of the obligations established by Italian law, by a regulation, by European Union legislation, or by an order of the Authority (for example, relating to anti-money laundering);
- exercising the rights of the Data Controller, for example the right to defence in court;

**B)** only with your specific and distinct consent (pursuant to art. 7 of the GDPR, as well as art. 23 of the Privacy Code) for the following marketing purposes:

- to send you newsletters, commercial communications and/or advertising material on products or services offered by the Data Collector via email, post and/or text message and/or telephone contacts, and to conduct surveys on your level of satisfaction with the quality of service;

- to send you commercial and/or promotional communications from third parties (e.g. business partners) via email, post and/or text messages and/or telephone contacts.

The provision of data for the purposes referred to in Point A) is mandatory. In its absence, we will not be able to guarantee you the requested services or supplies.

The provision of data for the purposes referred to in Point B) however is optional. You can therefore decide to not provide any data or to later refuse the processing of data that had been provided at an earlier date. In this case, you will not be able to receive newsletters, commercial communications and advertising material regarding the services offered by the Data Controller.

However, you will continue to be entitled to the services referred to in Point A).

Please note that if you are already a customer, we may send you commercial communications relating to services and products provided by the Data Controller that are similar to those you have already used unless you indicate your refusal of the same.

To obtain further detailed information on the purposes of the processing and on your Personal Data actually relevant for each purpose, the User should refer to the relevant sections of this document.

## Details regarding the processing of Personal Data

Personal Data is collected for the following purposes:

- Compliance with pre-contractual, contractual and fiscal obligations
- Contacts management and sending messages
- Statistics
- Advertising
- Tags management
- Displaying content from external platforms

## Rights of the Data Subject

As a Data Subject, you may exercise certain rights with reference to the data processed by the Data Controller. In particular, you have the right to:

- **withdraw consent at any time.** The Data Subject may withdraw their previously expressed consent to the processing of their Personal Data.
- **oppose the processing of your data.** The Data Subject may object to the processing of their data when its legal basis is other than consent and such does not prejudice specific legal obligations. Further details on the right of opposition are indicated in the section below.
- **access your data.** The Data Subject is entitled to obtain information on the data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the data processed.
- **verify and request correction.** The Data Subject can verify the correctness of their data and request its updating or correction.

- **obtain a limitation on processing.** When certain conditions occur, the Data Subject may request the limitation of the processing of their data. In this case, the Data Controller will not process the data for any other purpose other than its storage.
- **obtain the deletion or removal of their Personal Data.** When certain conditions occur, the Data Subject may request the data to be deleted by the Data Controller.
- **receive your data or have it transferred to another Data Controller.** The Data Subject has the right to receive their data in a structured format, in common use and readable by an automatic device and, where technically feasible, to obtain its transfer without hindrance to another Data Controller. This provision is applicable when the data is processed with automated instruments and the processing is based on the consent of the Data Subject, relating to a contract to which the Data Subject is a party or relating to contractual provisions connected to it.
- **make a complaint.** The Data Subject can lodge a complaint with the competent Personal Data Protection Authority or undertake proceedings in court.

## Details on right of opposition

When Personal Data is processed in the public interest, in the exercise of that public authority with which the Data Controller is vested or to pursue a legitimate interest of the Data Controller, Data Subjects are entitled to oppose the processing for reasons related to their particular situation.

Data Subjects are reminded that, if their data is processed for direct marketing purposes, they can oppose the processing without providing any reasons. To find out if the Data Controller processes data for direct marketing purposes, Data Subjects may refer to the relevant sections of this document.

## How to exercise the rights

You may exercise your rights at any time by sending an email to the contact address of the Data Controller indicated in this document. The requests are filed free of charge and processed by the Data Controller as swiftly as possible, **and in any case within one month.**

If you are no longer interested in the communications of TECNOSICUREZZA SRL and would like to cancel your newsletter subscription, you can do so by clicking on the "cancellation" link at the bottom of each email sent or by sending an email to the address: [info@tecnosicurezza.it](mailto:info@tecnosicurezza.it). In that case, your data will still be retained by Tecnosicurezza unless you specifically request cancellation as described above.

## Additional information on processing

### Legal defence

Your Personal Data may be used by the Data Controller in court proceedings or in the preparatory stages of the establishment of the same for defence against abuse of the use of this site or related services by the Data Subject.

The Data Subject declares to be aware that the Data Controller may be obliged to disclose the data by order of the public authorities.

### Specific information

Upon request, in addition to the information contained in this privacy policy, the Data Controller may provide you with additional and contextual information regarding specific services or the collection and processing of Personal Data.

### Information not contained in this policy

Further information in relation to the processing of Personal Data may be requested at any time from the Data Controller using the contact details indicated in the header.

## Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by informing Data Subjects on this page and, if technically and legally feasible, by sending a notification to the Data Subjects through one of the means of contact held by the Data Controller. Therefore, please check this page frequently, taking note of the date of last change shown at the bottom.

If the changes concern processing whose legal basis is consent, the Data Controller will obtain the User's consent again if necessary.

Last change: 25 May 2018

I declare to have read the privacy policy regarding the processing of my Personal Data for the purposes of providing the service and supplies and for the fulfilment of contractual and legal obligations (pursuant to art. 6, para. 1 of the GDPR, as well as art. 24 of the Privacy Code).

**DATE SIGNATURE**

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**CONSENT TO DATA PROCESSING FOR EXCLUSIVE PURPOSES OF MARKETING  
(pursuant to art. 7 of the GDPR, as well as art. 23 of the Privacy Code)**

COMPANY NAME / FIRST AND LAST NAMES

.....

ADDRESS

.....

I declare to have read the privacy policy regarding the processing of my Personal Data including for **purposes other than that of providing the service and supplies** and for the fulfilment of contractual and legal obligations.

Given that, as defined in the privacy policy that the undersigned expressly declares to have received and read, the execution of the promotional activity of Tecnosicurezza Srl may involve the need to process data

I agree

I do not agree

To the processing for the purposes described below:

**PURPOSES FOR WHICH CONSENT IS REQUIRED**

Marketing surveys, sending of advertising material, marketing and commercial information related to Tecnosicurezza Srl products or services in any way and by any means (including by automated means) carried out by Tecnosicurezza Srl and/or by related organisations, including through online communications channels (website, web, mail marketing, newsletter, etc.).

**DATE SIGNATURE**

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