

Privacy *Policy*

The current law on the processing of personal data defined in accordance with the provisions of Regulation EU 2016/679 contains provisions to ensure that the processing of personal data is done in compliance with the fundamental rights and freedoms of natural persons, with particular regard to the right to the protection of personal data.

Cieffe SRL

with registered office at Via Mecenate 84/8, Milan (MI)

Tax code 00819470196

(hereinafter “Controller”), in its capacity as Data Controller, hereby informs you pursuant to Art. 13 of Regulation EU no. 2016/679 that your data will be processed in the following ways and for the following purposes:

1. Object of the Processing

The data processed are related to the purchase or provision of services or an ongoing collaboration. The processing consists of the management of all administrative activities related to the commercial/contractual relationship such as the confirmation of orders or shipments, dealing with invoices and/or payment notes and/or accounting summaries, accounting records, the writing of or response to written communications including emails, and the management of any litigation.

2. Purposes of the processing

The personal data are collected and processed for the following purposes:

- fulfilment of all operations required by tax and social security regulations;
- assessments that are strictly related and instrumental to the establishment of contractual relations, including the acquisition of information prior to the conclusion of the contract;
- possible evaluation of the supplier/contractor on the basis of specifications resulting from quality indicators;
- activities related to managing disputes such as warnings, debt collection, settlement proposals, arbitrations, etc.

3. Lawfulness of the processing and data retention

The processing of your personal data is lawful for the following reasons:

- need to execute a contract you are a party to or for the performance of pre-contractual measures taken at your request;
- need to fulfil legal obligations that the Controller is subject to.

In accordance with the provisions of the relevant law, your personal data shall be kept for a period of time not exceeding what is necessary to achieve the purposes they are processed for.

Specifically, with regard to the management of the existing contractual relationship, data will be retained for the time defined by relevant laws, and upon termination of the service relationship the civil law data will be held for a period of ten years.

The data processing is not based on automated decision-making algorithms and no profiling is done.

4. Nature of the provision of data and consequences of refusal of consent

The provision of data for the aforementioned purposes is mandatory as it is required by legal and contractual obligations. Any refusal to provide them or any subsequent lack of authorisation to process them may result in the impossibility for the Controller to proceed with the contractual relationship (the data subject does not receive the service, breach of contract with related liability, failure to fulfil legal obligations with related legal sanctions, etc.).

5. Persons authorised to process your data

The personal data collected are processed by designated personnel who need to know them to do their work, and by external parties who may act as co-controllers or data processors, as the case may be.

For the purposes referred to above, your data may be made accessible to:

- employees and contractors of the Controller in Italy and abroad, in their capacity as appointees and/or internal data processors and/or system administrators;
- other third parties such as natural persons or companies or entities of another nature (by way of example, banks, professional firms, consultants, insurance companies for the provision of insurance services, etc.) performing outsourced activities on behalf of the Controller, in their capacity as external data processors.

6. Disclosure of the data

Your data collected as above will be disclosed to the following recipients:

- Banks
- Revenue Agency
- Professional and consulting firms
- Other public oversight authorities

Without the need for your express consent, the Controller may disclose your data for the above purposes to Supervisory Bodies, Judicial Authorities, insurance companies for the provision of insurance services, as well as to those parties to which disclosure is mandatory by law for the fulfilment of the above purposes. These parties will process the data in their capacity as autonomous data controllers.

Your data will not be disseminated.

7. Data transfer

Personal data are stored on servers located within the European Union.

In any case it is understood that if necessary the Controller will have the right to move the servers even outside the EU. In this case, the Data Controller hereby ensures that the transfer of data outside the EU will take place in accordance with applicable legal provisions, subject to the conclusion of the standard contractual clauses envisaged by the European Commission.

8. Rights of the data subject

As a data subject, you have the right to obtain confirmation as to whether or not your personal data are being processed, and if so to obtain access to all the relevant information.

You also have the right to:

- A. Know whether adequate safeguards have been put in place if the personal data are transferred to a third country or international organisation.
- B. Obtain a copy of the personal data being processed.
- C. Have inaccurate personal data corrected or incomplete personal data completed (right of rectification).
- D. Have your personal data deleted if one of the cases envisaged in the Regulation applies (right to be forgotten).
- E. Have the processing restricted in the cases envisaged by the Regulation (right of restriction).
- F. Receive the personal data you have provided to the Data Controller in a structured, machine-readable and commonly used format and have such data sent to another Data Controller (right to portability).

- G. Object at any time to the processing of your personal data on grounds relating to your particular situation, if the processing relates to tasks in the public interest or is necessary for the pursuit of a legitimate interest of the Controller or a third party (right to object).
- H. Withdraw consent to the processing of your data at any time without affecting the lawfulness of the processing based on the consent given before such withdrawal (right of withdrawal).

9. How to exercise your rights

If you wish to exercise your rights or to receive further information on your rights or on the possible transfer of your data to a third country, you may submit an express written request to the Data Controller's head office or by email to privacy@cieffemilano.it.

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority if you believe that the processing concerning your data violates Regulation EU 2016/679.

10. Controller, processor and appointees

The Data Controller is Cieffe SRL and can be contacted at privacy@cieffemilano.it.
The up-to-date list of data processors and those appointed to process the data is kept at the registered office of the Data Controller and is available on request by the data subject.