



# MEDANA & VISCA S.r.l.

**Subject: processing of personal data policy under the European Regulation of protection of personal data 2016/679.**

*Dear Customer/Supplier,*

Herewith we inform you that Art. 13 of the EU Regulation 2016/679 provides for the protection of the personal data of the people.

**MEDANA & VISCA S.r.l. with registered offices and headquarters in Regione Girussola n. 51 - 13011 Borgosesia (VC) and with operational headquarters in Località Molino Rastelli, 13018 Valduggia (VC)** as the data controller (herein after "Controller"), inform you that your data will be processed, following Art. 13 of the EU Regulation 2016/679 (herein after "GDPR"), with the following methods and for the following purpose:

## 1. Object of the data processing

The Controller processes the personal data collected during managing of contracts, identifying and non-sensitive (such as name, surname, company name, address, phone numbers, e-mail addresses, bank references and payment information, herein after "personal data" or "data").

## 2. Purposes of the data processing

Your personal data will be processed as follows:

- A) Without your express consent as per art. 6 lett. b), e) GDPR) for the following service purposes:
  - Enter into contracts for services provided by the controller;
  - Fulfill pre-contractual, contractual, and fiscal obligations resulting from existing relationships.
  - Management of administrative, accounting, orders, shipping, invoicing and service activities.
  - Fulfill the obligations established by the law, by a regulation, by the community legislation or by an order of the Authority (such as in the field of anti-money laundering);
  - Perform the rights of the controller, for example the right of defense in court.
- B) Only after your express consent (art. 7 GDPR) for the following Marketing purposes:
  - Send by e-mail, mail and/or sms and/or phone number, newsletters, business communications and/or marketing material on products or services offered by the Controller and also detect the degree of satisfaction with the quality of services.
  - Send by e-mail, mail and/or sms and/or phone number, business communications and/or marketing material of third parties (such as business partners, insurance companies, etc).

We inform you that if you are our customer already, we may send you business communications related to the Controller's services and products similar or identical to the ones you have already used, unless you have communicated your refusal (art. 130 c. 4 Codice Privacy).

## 3. Processing method

Your personal data are processed by the means of the operations indicated in the art. 4 Privacy Code and art. 4 no. 2) GDPR and in particular: collection, recording, organization, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation, and destruction of data. Your personal data is treated both in paper and electronic format and/or for automated processing.

The Data Controller will process personal data for the necessary time to fulfill the above mentioned purposes and in any case for no more than 10 years from the termination of the relationship for the Service Purposes and for no more than 2 years from the collection of the data for the Marketing Purposes.

## 4. Data Access

Your data may be accessible for the purposes referred to in the art. 2.A) and 2.B):

- To employees and collaborators of the Data Controller, as internal data processors and/or processing managers and/or system administrators;
- To third-party companies or other subjects (for example, banks, professional studios, consultants, insurance companies for the provision of insurance services, etc.) who carry out outsourced activities on behalf of the Data Controller, as external data processing managers.

## 5. Data communication

Without your express consent (as per art. 6 lett. b) e c) GDPR), the data controller will be allowed to communicate your data for the purposes indicated in art. 2.A).

- Following the legal obligations in terms of communications and diffusion, your personal data may be communicated in Italy and/or abroad.
- Professionals and consultants, consultancy companies, factoring companies, banks, debt collection companies, credit insurance companies, commercial information companies, companies operating in the transport sector; Public and private institution, also following inspections or checks such as, for example: Financial Administration, Tax Police authorities, Judicial Authorities, Italian Exchange Office, Labor Inspectorate, ASL, Social Security Bodies, Chamber of Commerce, etc.; Your information will not be disseminated.



## 6. Data transfer

The personal data are stored on servers located in ITALY, inside the European Union territory.

However, it is intended that the administrator will have the right to move the servers also extra-EU, if necessary. In this case, the controller ensures that the data transfer to an extra EU server will be made following the applicable rules, subject to the stipulation of the standard contractual clauses provided by the European Commission. The Controller has the right to use cloud services selected among those that provides adequate guarantees, as required by art. 46 GDPR 2016/679.

## 7. Nature of the data communication and consequences in case of refusal.

The data communication for the purposes referred to in art. 2.A) is mandatory. In case of refusal, we will not be able to guarantee the Services mentioned on art. 2.A).

The data communication for the purposes referred to in art. 2.B) is optional. You can therefore decide not to provide any data or to deny the possibility of processing the data already provided: in this case, you will not receive newsletters, commercial communications and advertising material relating to the Services offered by the Data Controller. You will however continue to benefit of the Services referred to in the art. 2.A).

## 8. Rights of the data subject

Art. 7 Privacy Code and art. 15 GDPR specify the rights of the data subjects, in particular:

A. Obtain confirmation of the existence of personal data concerning you, even if not yet registered, and their communication in a clear form;

B. Obtain indication of: a) the origin of the personal data; b) the purposes and methods of processing; c) of the logic applied in case of processing with the aid of electronic instruments; d) the details of the controller, managers and representative appointed under art. 3, paragraph 1, GDPR; e) of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them as designated representatives, managers or agents in the territory of the State.

C. Obtain: a) updates, changes or integration of data in case of interest; b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed; c) certification that the operations referred to in letters a) and b) have been brought to the attention, of those to whom the data have been communicated or spread, except the case in which this requirement is impossible or involves a manifestly disproportionate use of means compared to the protected right.

D. Oppose, totally or partially: a) for legitimate reasons to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and/or by traditional marketing methods by telephone and/or mail. Please note that the interested party's right of opposition, set out in the previous point b), for direct marketing purposes using automated methods, extends to traditional ones and that the possibility for the interested party to exercise the right of opposition partially remains. Therefore, the data subject can decide to receive only communications via traditional methods or only automated communications or neither of the two.

Where applicable, you also have the rights specified under articles. 16-21 GDPR (Right of rectification, right to be forgotten, right to limit processing, right to data portability, right to object), as well as the right to complain to the Authority.

## 9. How to exercising your rights

You can exercise your rights at any time by sending:

- a registered letter with return receipt/certified mail: to MEDANA & VISCA S.r.l. with registered and operational headquarters in Regione Girussola n. 51 - 13011 Borgosesia (VC), [pecmedanaevisca@dedalusmail.it](mailto:pecmedanaevisca@dedalusmail.it)

## 10. Minors

The Controller's Services and Website are not intended for people under the age of 18 and the controller does not intentionally collect personal information of minors. In case information on minors is unintentionally recorded, the controller will delete it promptly, upon request of the users.

## 11. Controller, manager and person in charge.

The data controller is MEDANA & VISCA S.r.l. with registered and operational headquarters in Regione Girussola n. 51 - 13011 Borgosesia (VC).

The updated list of data controllers and persons in charge of the processing is available at the above mentioned registered office.

The Data Controller