

**SUBJECT: Informative report in compliance with the provision of and in accordance with Articles 13 and 14 of the GDPR 2016/679 and the applicable Italian national legislation concerning the protection of personal data processing.**

## **INFORMATIVE REPORT**

As "Owner" or "Data Subject", namely the person the processed data refer to and / or the person who manages them in responsibility, we wish to make you aware of the essential elements of the processing operations performed.

### **Purpose of data processing.**

Personal data collection and processing are carried out with the purpose of conducting:

1. The fulfilment of all the operations imposed by regulatory obligations, of fiscal / tax / SIAE provisions arising from the normal course of business and of the prescriptions foreseen on the subject of anti-money-laundering.
2. The establishment and implementation of ongoing contractual relations, as well as the preparation and drafting of forms and the compilation of all the communications and declarations therefore provided.
3. The operations strictly connected and instrumental in launching the above-mentioned relationships, including the acquisition of information preliminary to the conclusion of the contract.
4. The managing of relations with the Client for activities of administration, accounting, orders, shipments, invoicing, services, controversy management.
5. Survey of the clients' degree of satisfaction and the production of statistics for internal use;
6. In particular, for the sending of advertising material or material intended for the direct sale, completion of market or business communication surveys both via automated communication methods (email, other distance means of communication like, by way of mere example, SMSs, MMSs, WhatsApp) and traditional communication methods (paper-based mail), from the Data Controller, in full respect of applicable Italian national legislation (article 130 of Legislative Decree No. 196/03) and of the Authority Provision of the 4th July 2013: "Guidelines on Marketing and against Spam";

and they will be subject to processing based on the principles of fairness, lawfulness, transparency, and the protection of Your personal privacy and rights.

Contractual and promotional purposes, purposes of service provision and trade dispute (or other) are relative to the processing of personal data of the Client alone. Personal data of the Client will be processed for the entire duration of the established contractual relationships and afterwards, for the fulfilment of all legal obligations, as well as for future commercial purposes.

### **Anti-money-laundering and antiterrorism.**

The provision of all data foreseen by the legislation in the field of anti-money-laundering and anti-terrorism is compulsory and any refusal to answer precludes the required professional performance and may result in a report to the competent surveillance authority.

In this respect, it is noted that data processing related to anti-money-laundering operations will be held having regard to the specific implementing rules imposed on non-financial agents by the Regulation on the field of data identification and conservation foreseen by Article 3, paragraph 2 of the Legislative Decree No. 56/2004 and adopted with Ministerial Decree No. 143/2006. Other information could also be drawn from public sources to comply with the obligations under Legislative Decree No. 231/2007.

### **Processing methods.**

Data processing for the purposes laid down in this document is held both via automated systems (through electronic or magnetic media) and non-automated systems, in paper form, with respect of the privacy and security rules laid down by law, by consequent regulations and internal rules.

### **Place of processing**

Data are currently processed and archived at the head office located in 47, Via Ronche – 33077 Sacile (Pordenone), Italy. Besides, they are processed on behalf of the author of this document by professionals and/or companies responsible for the pursuit of technical, development as well as managing, administrative and accounting activities.

### **Mandatory or voluntary nature of data provision.**

Some data are essential for the establishment of a contractual relationship or for its implementation, while others can be considered secondary to such purposes. Data provision to the author of this document is compulsory only for those data for which a regulatory or contractual obligation is foreseen.

### **Consequences resulting from a possible refusal to provide personal data**

In cases where data provision is foreseen by a regulatory or contractual obligation, any refusal would put the Supplier in a position not to be able to fulfil or pursue a contract, since it would constitute unlawful processing. In cases where no legal obligation to data provision is foreseen, the refusal would not produce the above-mentioned consequences but would prevent the implementation of secondary operations.

### **Data provision.**

Without prejudice to the communications and diffusions carried out in fulfilment of legal obligations, the data related to your own legal Person may be communicated in Italy and / or abroad to:



- Professionals and consultants, consulting firms, factoring firms, credit institutions, collection agencies, credit insurance companies, business information companies and companies operating in the transport sector;
- Public and Private entities, also as a result of inspections or verifications, like: Financial Administration, Tax Inspectorate, judicial authorities, Ufficio Italiano dei Cambi (UIC, the Italian Foreign Exchange Office), Labour Inspectorate, ASL (Local Health Agency), Social Security Offices, ENASARCO (National Welfare and Assistance Office for Sales Agents and Representatives), Chamber of Commerce etc.;
- Other companies of the Group, even based abroad (see the following point);
- Subjects who cannot have access to your data in accordance with provisions laid down by law;

Sensitive data, albeit treated anonymously, will not be object to any form of diffusion and/or disposition, except for the exclusive achievement of the purposes stated in this document and upon your specific written authorization.

#### **International data transfer.**

Your data may be communicated and/or transferred abroad, also to non-European Third Countries, only for the fulfilment of the obligations resulting from the service agreement and/or from the mandate of which you are a contracting party; or to fulfill your specific requests before the conclusion of the contract; or for the conclusion or the performance of a contract signed in Your favour in full respect of the Articles from No. 44 (and following) of the GDPR 2016/679; or for purely technical purposes related to the structure of the company's information system and/or the application of technical and organizational security measures considered eligible by the Data Controller (Article 32 of GDPR 2016/679).

#### **Data storage times:**

The supplied data will be stored in our archives according to the following parameters:

- For activities related to administration, accounting, orders, budgeting and production flow management, assistance and maintenance, shipping, invoicing, services, dispute management: 10 years as established by law – by virtue of Article 2220 c.c. (Italian Civil Code), except possible delayed payments that justify its extension;
- For the purposes of paragraph 5, storage times run until the termination of the contract and / or the end of the supply relationship.
- For marketing purposes: 24 months;

#### **Rights of the data subject.**

With relation to such personal data, the Client can exercise the rights permitted within the limits and at the conditions foreseen by Articles from 15 to 22 of the GDPR 2016/679.

In case of signing of any type of consent to the processing required by FAZIOLI PIANOFORTI SPA, it is noted that the Data Subject may revoke it at any time, without prejudice to the obligatory requirements foreseen by the legislation applicable when the waiver request is made, by contacting the Data Controller at the under-listed contacts.

#### **Rights of complaint**

Data Subjects who believe that the processing of their personal data through this website is carried out in violation of what foreseen by the GDPR 2016/679 have the right to lodge a complaint to FAZIOLI PIANOFORTI SPA, as foreseen by Article 77 of the GDPR 2016/679, or to take legal action (Article 79 of the GDPR 2016/679).

#### **Data Controller**

The Controller, whom you can address to invoke the rights referred to in Articles from 15 to 22 of the GDPR 2016/679 and by the applicable national legislation, is FAZIOLI PIANOFORTI SPA, headquartered in 47, Via Ronche – 33077 Sacile (Pordenone) Italy.

You can also claim the above-mentioned rights by sending communications to the following email address: [info@fazioli.com](mailto:info@fazioli.com).

Sacile,

FAZIOLI PIANOFORTI SPA

