

ITALICA SOCIETÀ BENEFIT SRL hereby notifies you that Regulation (EU) 2016/679 (“GDPR”) imposes new rules to protect people and other entities concerning processing of personal data.

This regulation requires data processing to be based on principles of lawfulness, fairness and transparency and to also protect confidentiality and legal rights, as indicated in Art. 5 GDPR.

In accordance with Art. 13 GDPR we hereby provide following information:

DATA CONTROLLER	The Data Controller is ITALICA SOCIETÀ BENEFIT SRL with registered office in VIA PONTEBBANA KM 98 N. 23 - 33098 VALVASONE ARZENE (PN), who can be contacted via email at: INFO@ITALICA-GROUP.IT, or by telephone at 0039 0434 870594.
DATA PROCESSED	<p><b>"Data"</b> refers to data referring to natural persons processed by the Company to establish and execute the contractual relationship with its customers/suppliers, in the form of the legal representative of the company signing the contract in the name of and on behalf of those companies, and also the employees/consultants of the customer/supplier, involved in activities governed by the contract.</p> <p>Data belonging to particular data categories involved in occupational health and safety regulations may also be processed. Data may also include any legal data held in public data bases.</p>
PURPOSE OF PROCESSING	<ul style="list-style-type: none"> <li>• Purposes connected to establishing and executing the contractual relationship between our Company and our customer/supplier;</li> <li>• Fulfilling administrative and accounting requirements;</li> <li>• Fulfilling requirements prescribed by the law, a regulation, Community legislation or an order from the Authority;</li> <li>• Ascertaining, exercising and/or defending the Company's rights in a court of law.</li> </ul>
PERIOD OF DATA STORAGE	<p>For the contract term and, upon termination of the contractual relationship, for a period of 10 years or as provided for by applicable legislation. In any case, longer or specific retention periods imposed by applicable legislation and regulations in the sector, or useful to the Company's legal defence, are not affected. In the event of a legal dispute, for the entire duration of the dispute, until the time limit for the appeals process has expired.</p> <p><b><i>When the date storage period has expired, data will be destroyed, erased or made anonymous, depending on technical erasure and backup procedures.</i></b></p>
LEGAL BASIS FOR PROCESSING	Processing is necessary to execute a contract or to fulfill a legal requirement to which the Data Controller is subject. It is always possible to request that the Data Controller clarifies the actual legal basis of each processing activity.
DATA COMMUNICATION	It is mandatory to communicate data in order to achieve the abovementioned purposes. Failure to communicate data makes it impossible to execute and achieve the abovementioned purposes.
DATA COMMUNICATION	<p>Data may be communicated to external subjects acting as independent Data Controllers or Data Processors appointed by the Data Controller as per Art. 28 GDPR. Examples include: Public Organizations, Public Authorities, Consultants and providers of various different services.</p> <p>The complete list of Recipients and Data Processors appointed by the Data Controller is always available at the registered office of the Data Controller.</p>
AUTHORIZED DATA PROCESSORS	Data may be processed by employees of company functions authorized to process data as above, who are expressly authorized to perform processing and who have received adequate operational training.
TRANSFER OF PERSONAL DATA	In accordance with Art. 44 et seq. GDPR 2016/679 some of your personal data may be communicated to recipients and Data Processors (the latter appointed specifically by the Data Controller) with headquarters in Non-European Third Countries, always according to the principles of lawfulness, fairness, transparency and protection of confidentiality.
RIGHTS OF THE DATA SUBJECT AND CLAIMS	<p>The data subject may exercise their rights concerning their personal data as specified in Art 15 et seq GDPR and specifically:</p> <p><b>Right of access</b> (Art. 15) - consists of obtaining confirmation of personal data processing from the Data Controller and in such case, obtaining access to that data and certain information (specified in the Article cited) regarding the data concerned. <b>Right to rectification</b> (Art. 16) - Consists in giving the data subject the possibility of modifying inaccurate data. <b>Right to erasure</b> (Art. 17) - the data subject may have data held by the Data Controller erased when, for example, consent to processing</p>

is withdrawn or the purpose pursued is achieved or when it is found to be unlawful. It is obviously not always possible to fulfill the request for erasure. For example, this is the case when data is required to fulfill a legal obligation or is necessary for the defence of rights in a court of law. **Right to object** (Art. 21) - The right to oppose processing must be guaranteed when the legal basis is the legitimate interest or execution of an act of public interest. This right also has limits because there may be cases in which the legitimate interests of the Data Controller may prevail over those of the data subject, rendering it essential to achieve the correct balance, or processing is necessary for an act of public interest or verification, defence or exercising of a right in a court of law. **Right to data portability** (Art. 20) - States that, where processing is based on contract or consent, if requested, personal data must be provided to the data subject in a structured and machine-readable format (json, xml, csv), this right applies only to data provided voluntarily and not to inferred or derived data. **Right of withdrawal** (Art. 7) - The data subject can withdraw any form of consent given to the processing requested by the Data Controller at any time, without prejudice to the mandatory requirements of applicable legislation at the time of the request for withdrawal. The data subject has the right to register a complaint with a Data Protection Authority in their country of residence or of work or in the country in which the presumed breach took place. All of the above rights may be exercised by sending a request to the Data Controller via the contact methods indicated in this policy.

Valvasone Arzene, \_\_\_/\_\_\_/\_\_\_\_\_

Data Controller  
ITALICA SOCIETÀ BENEFIT SRL



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