



Data Protection Management System

Doc. **INF-DPMS.02** Rev. **02** of **20/12/2022**
Classification: **L1 – PUBBLICO**

CUSTOMER PRIVACY POLICY

Made in accordance with Articles 12, 13 and 14 of Regulation (EU) 2016/679

F.lli Gancia & C. S.p.A.

Legal and operational headquarters: C.so Libertà, 66 – Canelli 14053 (AT)

VAT No. F/Company Register: IT 00619260052, docId:EDD87A8978CC2DC6422C9DF233DCDBE8 - REA Code: AT - 58097

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1 RECIPIENTS OF THE DOCUMENT

This document is addressed to our **Clients** or potential Clients and to all individuals who for whatever reason give their personal data to our organization while acting on behalf of or for our Clients or potential Clients.

Minors: In case you are a minor, such as a student included in an Alternanza Scuola Lavoro (D. Lgs.77/2005) program, please contact your company manager in order to better understand the contents of this document.

2 FOREWORD

In compliance with the guidance provided by **Regulation (EU) 2016/ 679** (hereinafter, "**Regulation**" or "**GDPR**") on the processing and free movement of personal data, you have the right to know all information regarding the processing of your personal data in a clear and transparent manner. Therefore, in compliance with this principle, we hereby intend to inform you about the processing of your personal data.

3 DEFINITIONS

Definitions of terms used in this policy, are to be understood as per Article 4 of the [EU Regulation 2016/679](#).

4 OWNER OF THE PROCESSING OF YOUR PERSONAL DATA

F.Ili Gancia & C. S.p.A. (hereinafter simply **F.Ili Gancia & C.**) is the Data Controller of your personal data in accordance with the Regulations. Below is the contact information:



F.Ili Gancia & C. S.p.A.

Legal and operational headquarters: C.so Libertà, 66 – Canelli 14053 (AT)

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AT - 58097

PEC: amministrazione@gancia.postecert.it

Phone +39 0141 8301

e-mail: dataprotection@gancia.it

Data Protection Officer (DPO): dpo@gancia.it

4.1 DATA PROTECTION OFFICER - DPO

F.Ili Gancia & C. although not required to appoint a DPO under Article 37 of the GDPR, but considering the protection of personal data to be of primary importance, has nevertheless decided to appoint a Data Protection Officer, who can be contacted at the following e-mail address: dpo@gancia.it

4.2 DATA PROTECTION COORDINATOR

F.Ili Gancia & C., also pursuant to Article 2-quaterdecies of Legislative Decree 196/2003 (so-called "Privacy Code"), has taken steps to appoint a company **Data Protection Coordinator with the** task of supervising the compliance of processing with the GDPR.

The Data Protection Coordinator is at your disposal for any clarification or information regarding the processing of your personal data and to facilitate you in the possible exercise of your rights under the Regulations.

You may contact the Data Protection Coordinator at the following e-mail address: dataprotection@gancia.it

5 OUR CORPORATE POLICY ON THE PROTECTION OF PERSONAL DATA

F.Ili Gancia & C., has always been very attentive to the security of the information it manages, with particular regard to information that may contain personal data (ex art 4.1 GDPR) or special categories of personal data (ex art. 9 GDPR). For this reason, the company has decided to adopt a single organizational model, called **Data Protection Management System** (hereinafter "**DPMS**" or "**System**"), also based on the guidelines of ISO 27001 standards. Taking into account the context of our organization, supply chain requirements and stakeholder expectations, the System, establishes Leadership and commitment of the Data Controller, through the definition of organizational roles, internal and external responsibilities and authority of the individuals involved. Within the DPMS, security objectives are identified and the actions necessary to achieve them are planned. The necessary resources and expertise are also ensured in order to constantly and continuously improve the System over time, periodically verifying its scope and alignment with corporate purposes.



6 PURPOSE OF PROCESSING

Personal data referring to your person, such as name, surname, address, telephone, fax, e-mail, company role, as well as other information voluntarily given by you or your organization to our Company or by **F.Ili Gancia & C.** inferred by virtue of the existing relationship, (hereinafter, the "Data") will be processed exclusively for the following purposes:

ID	Description of purpose, basis of lawfulness, origin of data, and duration of processing
F1	<p>Purpose: <i>To execute contractual and/or pre-contractual measures aimed at the provision of goods or services by F.Ili Gancia & C. to your organization. This includes handling requests for quotations, orders, any claims, guarantees, payments and refunds.</i></p> <p>Lawfulness: These processing operations are carried out in accordance with Art. 6(1)(b) of the GDPR.</p> <p>Data provenance: Data, generally contact information associated with your other business information, may be conferred directly by you or communicated by your organization, derived from your existing relationship or may come from public directories or collected from third parties who have reported to you.</p> <p>Duration of treatment: Treatment will cease at the end of the contractual relationship.</p> <p>Further Retention: If deemed appropriate and lawful, at the end of the processing duration, your personal data may be anonymized (see purpose F8) or further retained for civil or judicial reasons (see purpose F5).</p>
F2	<p>Purpose: <i>To fulfill legal obligations, regulations arising from EU legislation, or arising from instructions given by public authorities or supervisory bodies. For example, your personal data may be used to manage invoicing, comply with our accounting, tax and accounting obligations, protect health and safety in the workplace (should our employees perform their work at one of your establishments), fulfill any reporting obligations.</i></p> <p>Lawfulness: These treatments are carried out in accordance with Art. 6 para. 1 letter c) of the GDPR</p> <p>Data provenance: Data, generally contact information associated with your other business information, may be conferred directly by you or communicated by your organization, derived from your existing relationship, or may be from public directories or collected from third parties who have reported to you.</p> <p>Duration of treatment: Treatment will cease when the legal obligation expires.</p> <p>Further Retention: Consistent with the retention period imposed by law, if deemed necessary and lawful, your data may be further retained for civil or judicial reasons (see purpose F5).</p>
F3	<p>Purpose: <i>To manage, care for, and consolidate the business relationship with the Customer over time (so-called "loyalty"), plan commercial, financial, and market strategies, set budgets, optimize operational strategies, and plan business objectives</i></p> <p>Lawfulness: These processing operations are carried out in accordance with Art. 6 par. 1 letter f) of the GDPR on the basis of the Legitimate Interest of the Owner.</p> <p>Data Provenance: Data, generally are those collected for purposes F1 and F2 and possibly supplemented by us through the provision of additional information by you or your organization or otherwise obtained during the existing relationship.</p> <p>Duration of processing: Subject to the exercise of the right to object, the processing will last until the interest pursued by the Data Controller is achieved. Normally 10 years from the last business relationship.</p> <p>Further Retention: If deemed appropriate and lawful, upon completion of processing, your personal data may be anonymized (see purpose F8) or further retained for civil or judicial reasons (see purpose F5).</p>
F4	<p>Purpose: <i>Achieve, maintain and demonstrate certification or accreditation, comply with regulatory standards (e.g., ISO 9001, ISO 14001, ISO 45001, ISO 27001, etc.), enforce specific codes of ethics, conduct or ethics (e.g., Code of Business Ethics).</i></p> <p>Lawfulness: <i>These processing operations are carried out in accordance with Art. 6 par. 1 letter f) of the GDPR on the basis of the Legitimate Interest of the Owner.</i></p> <p>Data provenance: The data processed are generally collected for purposes F1, F2 and F3. However, additional data may be collected by us or conferred by you and/or your organization, during the course of the existing relationship.</p> <p>Duration of processing: Subject to the exercise of your right to object, Processing will last for the duration of the business relationship or until the legitimate interest pursued by the Data Controller is achieved.</p> <p>Further Retention: If deemed appropriate and lawful, upon completion of processing, your personal data may be further anonymized (see purpose F8) or retained for civil or judicial reasons (see purpose F5).</p>

Purpose: To take protective actions to protect the interests of the Company or those of third parties such as, for example, exercising defense in court and/or enforcing rights.

Lawfulness: These processing operations are carried out in accordance with Art. 6 par. 1 letter f) of the GDPR on the basis of the Legitimate Interest of the Owner.

F5 Data provenance: Data subject to retention processing are conferred or collected for all the purposes stated in this document.

Duration of processing: Until the purposes of protection are achieved.

Retention: We will retain your personal data for the prescriptive period provided by the legislation for the protection of related rights, subject in any case to longer retention periods provided for by specific sector regulations. Specifically, data will be processed and/or retained for a period of **10 (ten) years from the** termination of the contract, termination of the relationship or achievement of the purposes of collection.

Purpose: To promote our Brand, activities, products and services. For example, we may send you commercial communications from time to time regarding services similar to those you have previously used (so-called "Soft-Spam").

Lawfulness: This processing will be carried out in accordance with Art. 6 par. 1 letter f) of the GDPR on the basis of the Legitimate Interest of the Holder in compliance with the provisions of Art. 130 of Legislative Decree 196/2003.

F6 Provenance: data were conferred for the purpose **F1**

Duration of Processing: We will process your data for the duration of the **F3** purposes or your objection to processing.

Further Retention: if deemed appropriate and necessary, evidence of communications sent (e.g., date and time, subject, recipient) may be retained at the end of processing in order to demonstrate the correctness and lawfulness of the communications (see purpose **F5**).

Purposes: Sending commercial communications for the Purpose of promoting products or services (Marketing)

Lawfulness: This processing will be carried out in accordance with Article 6 Paragraph 1 letter a) of the GDPR on the basis of your free and informed consent.

F7 Data Provenance: directly conferred, from public lists, collected from third parties.

Duration of processing: We will process your personal data for as long as your consent is valid.

Further Retention: Data will be retained until your consent is revoked. This is without prejudice to longer retention periods provided for any **F5** purposes.

Purpose: Anonymization for internal analysis and statistical purposes. Under certain circumstances, for processing for purposes **F1, F2, F3** and **F4** we may anonymize some data so that it can no longer be associated with you, in such cases it will be possible for us to use such data without further notice to you and retain it indefinitely. We will only carry out anonymization if we are able to ensure and demonstrate over time that we cannot associate such data with you again (e.g., through Reverse Engineering techniques).

F8 For example, the data may be used to process market, quality, security, website access, etc. statistics. Should the use of your anonymized data be required to feed statistics that might fall outside of your legitimate expectations, we will provide you with specific information and collect your consent if necessary.

Lawfulness: This anonymization processing will be carried out in accordance with Art. 6 par. 1(f) of the GDPR on the basis of the Legitimate Interest of the Owner.

Data Source: Collected for purposes **F1, F2, F3**, and **F4**

Duration and Retention: We will retain and use the anonymized data indefinitely



If, during the course of the existing relationship, further and specific processing, not indicated in this policy, should become necessary, it will be the responsibility of **F.lli Gancia & C.** provide you and/or your Organization with specific information in advance and, if appropriate, proceed to acquire the necessary consent.

7 PRINCIPLES APPLICABLE TO DATA PROCESSING

From the stage of information collection, any processing carried out by us will respect the principle of relevance and non excess by virtue of the purposes pursued by the same. We inform you that access to your personal data by the persons in charge, is allowed only if the knowledge is considered strictly essential to the pursuit of the purposes outlined in this document.



8 MANDATORY OR OPTIONAL NATURE OF PROVIDING DATA

For the purposes **F1** and **F2** of this policy, the provision of personal data is a necessary requirement and any refusal to provide the requested information, could totally or partially prevent the performance of activities aimed at the fulfillment of the commercial supply contract, or the fulfillment of legal obligations, regulations arising from EU legislation, or arising from instructions issued by public authorities or supervisory bodies. By way of example, our Company may be prevented from supplying you or your organization with goods or services.

9 FURTHER INFORMATION ON CONSERVATION

Except as stated in [Section 6](#) of this policy, for organizational reasons, data will be deleted/destroyed or anonymized within **90** days after the expiration of the retention periods.

10 MODE OF TREATMENT

With logics strictly related to the purposes of collection, in **F.Ili Gancia & C.** we adopt and observe strict procedures and security measures to store, use and allow you to view your personal data by means of paper, computer and telematic tools, so as to always guarantee their protection from unauthorized or unlawful processing and from accidental loss, destruction or damage.

Specifically, your data are:

- collected solely for the stated purposes and subsequently processed in accordance with those purposes;
- adequate, relevant and limited with respect to the purposes stated above ("so-called data minimization");
- accurate and, if necessary, updated, deleted and/or rectified, including according to your input, if any;
- used and kept for a period of time not exceeding the fulfillment of the purposes for which they are collected.

10.1 AUTOMATED DECISIONS



In order to achieve the purposes of this policy statement, **F.Ili Gancia & C.** does not implement automated decisions based on your personal data.

10.2 SAFETY



F.Ili Gancia & C. has taken steps to survey the risks to the rights and freedoms of the data subjects involved in the processing operations declared in this information notice, also considering the risks impending on the information systems used for such processing. The risks were subsequently assessed, analyzing the sources of risk and mitigating the threats capable of materializing them through the adoption of technical and organizational measures deemed appropriate.

11 SCOPE OF DATA COMMUNICATION AND DISSEMINATION

For the pursuit of the purposes stated herein and to the extent strictly necessary for that purpose, **F.Ili Gancia & C.** makes use of the activities of external parties with whom special agreements on the processing of personal data are stipulated to regulate the relations of **Ownership/Responsibility** under the Regulations (e.g. external parties that carry out technical, commercial, legal, administrative consultancy, companies that provide Cloud IT services, data processing, shipping and transport services, banks, entities, public administrations, authorities, supervisory bodies, etc.).

Internally, individuals involved in the processing activities of your personal data are bound to confidentiality, properly trained and appointed as "**Authorized**" subjects for processing.

Subject to any legal obligations, **your personal data will not be disseminated in any way.**

For more information about who may learn about your personal data, you can contact our Corporate Data Protection Coordinator.

12 DATA TRANSFER ABROAD

For the purposes stated in this notice, **F.Ili Gancia & C.** does not transfer your data outside the European Economic Area (EEA). However, should your personal data be transferred to countries outside the European Economic Area (EEA), in the absence of adequacy decisions from the European Union Commission, our Company will ensure that appropriate safeguards are in place to protect your personal data in those countries. Some of the safeguards that might be adopted,



where appropriate, include the use of standard contractual clauses approved by the European Commission, pseudonymization and, if possible, encryption of the data itself.

By way of example but not limited to, we inform you that the transfer abroad of your personal data is often related to the use of cloud technologies, digital communication systems, security software and protection of IT services. In these cases, our Company is committed to using services chosen from operators that guarantee higher standards of security and attention to the protection of personal data.

In this regard, we would like to inform you that **F.lli Gancia & C.** uses some ICT services, provided by U.S. companies such as, for example, Microsoft, Google and Apple, which act as our Data Processors pursuant to art 28 of the GDPR.

For this reason, we sign service contracts and "*Data Processing Agreements*" (DPAs) with such companies, which also include the "*Standard Contractual Clauses*" (SCCs) established by the European Commission under Article 46(1) GDPR.

However, while selecting, where possible, the provision of such services through Data Centers located within the EEA, the Data Processor may have to allow U.S. authorities access to our data as a result of the so-called "Cloud ACT."

13 RIGHTS OF THE DATA SUBJECT

As a data subject to the processing of your personal data, you may exercise at any time, the rights recognized in Articles 15 to 22 of the Regulations.

In particular, in the manner and within the limits of the law, you have the right to ask our Company for access to your personal data, rectification, cancellation or restriction of the processing of personal data concerning you and to object to their processing. To exercise your rights you may use the contact channels provided in this document.



You can obtain more information about the rights applicable to the treatments stated in this policy within [ANNEX A](#)

14 COMPLAINT TO THE CONTROL AUTHORITY (Art. 77 GDPR)

Without prejudice to the possibility of turning to **F.lli Gancia & C.** to obtain any information or to exercise your rights, we inform you that you may lodge a complaint before the competent independent administrative authority in the Member State of the European Union where you normally reside, where you work, or where you believe an alleged violation of the law on the protection of your personal data has occurred. In the Italian territory, you may file a complaint with the Garante per la Protezione dei Dati Personali (GPDP). For information on how to file your complaint with the Authority you can use the following contact details:



Data Protection Authority

Switchboard: +39 06.696771

E-mail address: garante@gpdp.it

PEC address: protocollo@pec.gpdp.it

Web site: <https://www.garanteprivacy.it>

15 DISCLOSURE UPDATE

This notice, **INF-DPMS.02 "CUSTOMER PRIVACY DISCLOSURE" Version 02** effective as of **20/12/2022**, replaces the previous one issued on 05/25/2018. The document is revised periodically as regulatory and/or company changes occur.

If there is a change in its basic parts (such as purposes, methods, to whom we communicate the data, where we transfer it, etc.) it will be the responsibility of our Company to inform you of the change.



You can find the updated version of this policy on the institutional website of **F.lli Gancia & C. S.p.A.** at the following link: <https://gancia.it/privacy>

ANNEX A

GUIDE TO THE EXERCISE OF RIGHTS APPLICABLE TO TREATMENTS DECLARED IN THE CUSTOMER INFORMATION INF-DPMS.02 VER. 2 OF 20/12/2022

RIGHT OF ACCESS (Art. 15 GDPR).

As a data subject, you have the right to obtain confirmation as to whether or not we are processing personal data about you and, if so, to obtain access to the following information:

1. the purposes of processing;
2. the categories of personal data in question;
3. The recipients or categories of recipients to whom the personal data have been or will be disclosed, particularly if recipients in third countries or international organizations;
4. when possible, the intended retention period of personal data or, if not possible, the criteria used to determine this period;
5. the existence of the data subject's right to request from the data controller the rectification or erasure of personal data or the restriction of the processing of personal data concerning him or her or to object to their processing;
6. The right to file a complaint with a supervisory authority;
7. where the data have not been conferred directly by you, all available information about their origin;
8. the existence of automated decision-making, including profiling, and, at least in such cases, meaningful information about the logic used, as well as the consequences of such processing for you;
9. if your personal data is transferred to a third country or international organization, you have the right to be informed of the existence of adequate safeguards under Articles 45-50 of the GDPR.



Your right to obtain a copy of the data will only be allowed if it can be done without infringing on the rights and freedoms of others. Should you decide to exercise this right, we will provide you with a copy of the personal data being processed. If you **request additional copies, we may charge you a fee based on our administrative costs.**

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of its basis of lawfulness. In particular:

	F1	F2	F3	F4	F5	F6	F7	F8
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Specific conditions of non-applicability

- The right does not apply to data already anonymized for **F8** purposes

RIGHT OF RECTIFICATION (Art. 16 GDPR)

You have the right to obtain from us the modification and updating of your personal data without undue delay. Taking into account the purposes of the processing, you have the right to obtain the integration of your incomplete personal data, including by providing us with a supplementary declaration.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of its lawful basis. In particular, it is applicable to the following treatments:

	F1	F2	F3	F4	F5	F6	F7	F8
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Specific conditions of non-applicability

- The right is not directly applicable to processing carried out for purposes **F4, F5, F6** and **F8**, as data collected for purposes **F1, F2** and **F3** are used for such processing.



RIGHT TO CANCEL "RIGHT TO OBLIGATION" (Art. 17 GDPR)

You have the right to obtain the deletion of personal data concerning you without undue delay.

Conditions of applicability

We grant you this right for the following treatments when any of the following reasons exist:

1. When personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6	F7	F8
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Specific conditions of non-applicability

- The right does not apply to data already anonymized for **F8** purposes

2. if you have withdrawn the consent on which the processing is based and there is no other legal basis for continuing it in the absence of your authorization:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6	F7	F8
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Specific conditions of non-applicability

- The right does not apply to treatments **F1, F2, F3, F4, F5, F6** and **F8** because they are not based on the consent of the data subject.

3. if you object to the processing and there is no overriding legitimate reason for us to proceed with the processing anyway:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6	F7	F8
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Specific conditions of non-applicability

- The right does not apply to **F1, F2, and F7** processing as it is not based on legitimate interest and to data already anonymized for **F8** purposes

4. Should personal data be processed unlawfully:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6	F7	F8
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5. If personal data must be deleted to fulfill a legal obligation to which we are subject as the Data Controller:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6	F7	F8
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Specific conditions of non-applicability

- The right does not apply to data already anonymized for **F8** purposes

6. Where personal data have been collected in connection with the provision of information society services:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6	F7	F8
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Specific conditions of non-applicability

- The right does not apply to any of the treatments stated in this policy.

RIGHT TO LIMIT PROCESSING (Art. 18 GDPR).

This right is guaranteed for all processing carried out by us regardless of the lawful basis used.



Personal data subject to limitation, are processed, except for storage, only with your consent or for the establishment, exercise or defense of a right in court or to protect the rights of another natural or legal person. In addition, we inform you that the data subject who has obtained the restriction of processing is informed by the data controller before the restriction is lifted.

Conditions of applicability

You have the right to obtain restriction of processing when one of the following occurs:

1. You have disputed the accuracy of personal data; the restriction will be applied for the period necessary to allow us to verify the accuracy of such data:



Specific conditions of non-applicability

The right does not apply to data already anonymized for **F8** purposes

2. the processing is unlawful and you object to the deletion of your personal data by requesting, instead, that their use be restricted:



Specific conditions of non-applicability

The right does not apply to data already anonymized for **F8** purposes

3. although we no longer need it for processing purposes, the personal data are necessary for you to establish, exercise, or defend a right in court:



Specific conditions of non-applicability

The right does not apply to data already anonymized for **F8** purposes

4. You have objected to the processing; the restriction will be applied pending verification as to whether our legitimate reasons for its continuation prevail:



Specific conditions of non-applicability

The right does not apply to data that have already been anonymized for **F8** purposes and to **F1 and F2** processing because they are not based on legitimate interest.

RIGHT TO NOTIFICATION (Art. 19 GDPR)

You have the right to obtain from us direct communication to each of the recipients to whom your personal data have been transmitted, regarding your requests for rectification or erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort. In addition, should you deem it appropriate, you have the right to obtain a list of the recipients of your data.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of the lawful basis used:

	F1	F2	F3	F4	F5	F6	F7	F8
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Specific conditions of non-applicability

The right does not apply to data already anonymized for **F8** purposes

RIGHT TO DATA PORTABILITY (Art. 20 GDPR).

You have the right to receive in a structured, commonly used and machine-readable format the personal data concerning you provided to us and you have the right to obtain from us the direct transmission of such data to another data controller if technically feasible.

Conditions of applicability

This right is guaranteed only for processing that has consent or contract as its legal basis and is carried out by automated means:

	F1	F2	F3	F4	F5	F6	F7	F8
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Specific conditions of non-applicability

The right does not apply to the processing carried out by us

RIGHT OF OPPOSITION (Art. 21 GDPR)

You have the right to object at any time to the processing of your personal data based on our legitimate interest, including profiling.



We will refrain from further processing your personal data only if we are unable to demonstrate the existence of legitimate reasons overriding your interests, rights and freedoms. Processing will continue even if the data are necessary for the establishment, exercise or defense of a right of ours or of third parties in litigation.

Conditions of applicability:

The legal basis for processing must be legitimate interest. The right is applicable to the following processing:

	F1	F2	F3	F4	F5	F6	F7	F8
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Specific conditions of non-applicability

The right does not apply to processing carried out for purposes **F1, F2 and F7 as it is** not based on legitimate interest, and to processing carried out for purpose F5 as it is necessary for investigation and defense in litigation.

SPECIFIC RIGHTS IN THE CASE OF AUTOMATIC DECISION MAKING PROCESSES (Art. 21 GDPR)

You have the right not to be subjected to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or significantly affects you in a similar way. In addition, You have the right to obtain human intervention from the Controller, to express Your opinion and to challenge the automated decision.

In any case, decisions should not be based on the special categories of personal data referred to in Article 9(1) of the GDPR, unless Article 9(2)(a) or (g) of the GDPR applies and appropriate measures are in place to protect your rights and freedoms.

Conditions of applicability

The right does not apply if the decision:



- Is necessary for the conclusion or performance of a contract between us;
- Is based on your explicit consent;
- the decision is authorized by Union or member state law.

	F1	F2	F3	F4	F5	F6	F7	F8
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Specific conditions of non-applicability

- The right does not apply to any of the treatments stated in this policy because none of them subjects the data subject to a decision based solely on automated processing.

RIGHT TO REIMBURSEMENT OF DAMAGE (Art. 82 GDPR)

We inform you that anyone who suffers tangible or intangible damage caused by a violation of Regulation 2016/679 has the right to obtain compensation for such damage.

FORMS FOR THE EXERCISE OF RIGHTS

To exercise your rights towards our Company, we advise you to use the following form made available by the Supervisory Authority:

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>

We remind you that your identification from our side is always required.

End of Document