



## **Data Protection Management System**

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

# ***VISITORS PRIVACY POLICY***

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

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

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

VAT No. F/Company Register: IT 00619260052, docId:F9E605B690E47B1A43EB8E4E61011665 - REA Code: AT - 58097

PEC: [amministrazione@gancia.postecert.it](mailto:amministrazione@gancia.postecert.it)

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## 1 RECIPIENTS OF THE DOCUMENT

This notice is issued to you regarding the acquisition of your personal data following your request for access to the premises of **F.Ili Gancia & C. S.p.A.** as a guest/visitor.

## 2 FOREWORD

In compliance with the guidance set forth in **Regulation (EU) 2016/ 679** (hereinafter, "**Regulation**" or "**GDPR**") regarding 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.

## 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)

C.F./P.IVA IT 00619260052, docId:F9E605B690E47B1A43EB8E4E61011665 - REA Code:

AT - 58097

PEC: [amministrazione@gancia.postecert.it](mailto:amministrazione@gancia.postecert.it)

Phone +39 0141 8301

e-mail: [dataprotection@gancia.it](mailto:dataprotection@gancia.it)

Data Protection Officer (DPO): [dpo@gancia.it](mailto: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](mailto: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 can contact the Data Protection Coordinator at the following e-mail address: [dataprotection@gancia.it](mailto:dataprotection@gancia.it)

## 5 TREATMENT

### 5.1 WHY WE ARE ASKING YOU FOR YOUR DATA

Personal data referable to your person and all other relevant information voluntarily given by you or your organization to our Company or inferred by us during your visit, (hereinafter, the "Data"), will be processed, in order to allow your secure access to our premises. This will involve identifying you (e.g., we will view your ID) and recording certain identifying and contact information.

In addition, from the information collected, we will be able to verify your presence on our premises or contact your organization in case of accidents or disasters.

### 5.2 WHAT ARE THE PURPOSES

- F1. Ensuring the security of access to our restricted areas;*
- F2. prevent crimes and/or abuses and 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;*
- F3. Ensure the safety and health of visitors within our premises in case of accident, disaster or necessity;*
- F4. Fulfilling legal obligations, regulations to EU legislation, or arising from instructions issued by public authorities or supervisory bodies;*

- F5.** *achieve, maintain and demonstrate certification or accreditation, comply with regulatory standards apply specific codes of ethics, conduct or ethics;*
- F6.** *fulfill our confidentiality obligations by transferring these obligations to our visitors by having them sign appropriate NDA confidentiality agreements depending on what information the visitor might learn, even accidentally, during their visit.*

### 5.3 **BECAUSE WE CAN DO IT**

For the purposes explained above, we may process your personal data on the following lawful basis.



**LEGITIMATE INTEREST** under Article 6(1)(f) of the GDPR.

We believe it is our legitimate interest to pursue purposes **F1**, **F2**, **F3**, and **F5** and to carry out all processing deemed necessary to ensure adequate protection for our assets, the safety of our visitors, achieve/maintain certifications and accreditations with clients, and comply with industry standards.



**LEGAL OBLIGATION** under Article 6(1)(c) of the GDPR.

For purpose **F4**, the processing of your personal data will be carried out to fulfill legal obligations or measures of Authorities. For example, obligations established by Legislative Decree 81/2008 on safety in the workplace or measures of Authorities for the containment of health emergency.



**CONTRACTUAL OBLIGATION** under Article 6(1)(b) of the GDPR.

For purpose **F6**, processing is necessary to fulfill contractual obligations to which we are bound.

### 5.4 **WHERE YOUR PERSONAL DATA COMES FROM**

Information is generally provided by you to our authorized personnel by filling out the appropriate access registration form (registry) or while you are on our premises. However, some information about you may be conferred by your organization or collected by us during your visit.

### 5.5 **WHAT KIND OF PERSONAL DATA WILL BE PROCESSED**

- First name, last name, company, date, time of entry and exit;
- her ID if we have not already identified her otherwise;
- his signature;
- reason for the visit, any accompanying assets;
- Any statements or other relevant information spontaneously provided by you or obtained by us during your visit.

### 5.6 **MANDATORY OR OPTIONAL NATURE OF PROVIDING DATA**

The communication of your personal data, while voluntary and optional, is a binding requirement for obtaining access to specific areas of our company. In addition, the registration of your presence on our premises may, in some cases, be mandatory in order to comply with the obligations of specific laws on health safety in the workplace (e.g. Legislative Decree 81/2008).

### 5.7 **CRITERIA OR THE TIMING OF STORAGE**

For purposes **F1**, **F2** and **F5**, we will retain your personal data for the period of **24 months**. This period is deemed adequate to meet our organizational needs with regard to any investigation of security breaches, provided that it is not necessary to retain it further to defend or enforce a right, or any further legal obligations or, finally, by order of the Public Authorities.

For purpose **F3**, your data could be deleted the day after registration (achievement of purpose), however, the access log is unique and the purposes are therefore unified to the same retention times.

For the purpose **F4** we will retain your personal data for the prescriptive period provided for in the regulations for the protection of related rights, subject in any case to longer retention periods provided for in specific industry regulations.

For purpose **F6**, documents will be kept for the duration of the confidentiality bond and 10 years thereafter.

## 6 **FURTHER TREATMENT I**



If, during your visit, further and specific treatment, not indicated in this information sheet, 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 MODE OF TREATMENT

With logic 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 in relation 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.

## 9 DATA SECURITY PERSONAL

**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.

## 10 SCOPE OF DATA COMMUNICATION AND DISSEMINATION

For the pursuit of the stated purposes 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.**

## 11 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).

## 12 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](#)

## 13 COMPLAINT TO THE CONTROL AUTHORITY (Art. 77 GDPR)

Without prejudice to the possibility of turning to **F.Ili 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 information:



**Data Protection Authority**

Switchboard: +39 06.696771  
E-mail address: [garante@gpdp.it](mailto:garante@gpdp.it)  
PEC address: [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it)  
Web site: <https://www.garanteprivacy.it>

## 14 DISCLOSURE UPDATE

This notice, **INF-DPMS.02A "VISITOR 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.



You can find the updated version of this policy on the institutional website of **F.Ili 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 VISITORS' INFORMATION INF-DPMS.02A 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:



Specific conditions of non-applicability

None

#### **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:



Specific conditions of non-applicability

None



**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
-------------------------------------	----	----	----	----	----	----

Specific conditions of non-applicability

None

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. The right does not apply to any of the processing stated in this notice:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6
-------------------------------------	----	----	----	----	----	----

Specific conditions of non-applicability

The right is not applicable because none of the treatments bases its lawfulness on consent

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
-------------------------------------	----	----	----	----	----	----

Specific conditions of non-applicability

The right is not applicable to **F4 and F6** treatments because they are not based on legitimate interest

4. Should personal data be processed unlawfully:

<input checked="" type="checkbox"/>	F1	F2	F3	F4	F5	F6
-------------------------------------	----	----	----	----	----	----

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
-------------------------------------	----	----	----	----	----	----

Specific conditions of non-applicability

None

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
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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

None

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

None

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

None

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 **F4** and **F6** treatments 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
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Specific conditions of non-applicability

None

### **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
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Specific conditions of non-applicability

The right does not apply to the treatments stated in this notice

### **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
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Specific conditions of non-applicability

The right does not apply to processing carried out for purposes **F4** and **F6** because it is not based on legitimate interest, and to processing carried out for purpose **F2** when necessary for ascertainment 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
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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 **F.Ili Gancia & C.**, we advise you to use the following form made available by the Guarantor 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