

Pursuant to articles 13-14 of Regulation EU 2016/679 (hereinafter GDPR) in relation to the personal data which will be obtained by FRIDLE GROUP S.r.l., we would like to inform you as follows:

1. DATA CONTROLLER

The Data Controller is FRIDLE GROUP S.r.l. (hereinafter FRG) with registered office in Costabissara (VI), at 53 Via G. Galilei.

2. OBJECT OF THE PROCESSING OF DATA

FRG collects non sensitive identifying personal data (e.g. name, surname, company name, address, tax code, VAT number, telephone number, e-mail, company role).

3. PURPOSE OF THE PROCESSING OF DATA

Your data will be used:

- a) for the correct and complete performance of the existing contractual, precontractual and/or commercial relationship (art. 6 para.1/b of the GDPR), for the fulfilment of legal and administrative/accounting obligations. For these purposes, processing will be done without the need for specific consent;
- b) with your specific and separate consent, so that we may send you commercial and promotional information related to our products and services (art. 7 of the GDPR). We would like to point out that, if you are already a customer, we may send you commercial communications related to products and services similar to those that you have already acquired, unless you disagree.

4. NATURE OF THE PROVISION OF DATA AND CONSEQUENCES OF REFUSAL

The provision of data for the purposes under point 3.a is absolutely necessary. If such data are not provided, it will be impossible to establish a trade relationship.

The provision of data for the purposes under point 3.b is optional; if such data are not provided, it will still be possible to maintain the existing relationship, but you will not be able to receive commercial and promotional information relating to the products and services offered by FRG.

5. METHODS AND DURATION OF DATA PROCESSING

Processing shall be performed with the operations or set of operations indicated in art. 4 para. 2 of the GDPR (collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction). The operations may be performed with out without the help of electronic or otherwise automated means, in compliance with the security measures of art. 32 of the GDPR.

The data collected for the purposes under point 2.a will be retained for the period of time required by the law. The data collected for the exclusive purposes under point 3.b will be anonymised after 3 years from your last purchase or at the moment you withdraw your consent.

The data shall not be disseminated and shall be held in paper-based or electronic files inside the European Union.

6. COMMUNICATION OF DATA

The data may be made available, for the aforementioned purposes, to third parties who carry out activities on behalf of FRG, such as credit institutions, debt recovery companies, credit insurance companies, commercial information companies, IT assistance companies, agents, professional and consultants, as well as supervision and control Bodies and, in general, persons in charge of a public service. Such persons/companies shall operate as autonomous controllers or shall be appointed as Data Processors, in which case they will receive adequate operating instructions so that they may guarantee the confidentiality and security of the data.

Within the limits that are absolutely necessary for the performance of the contractual relationship, your data may be communicated to third parties (e.g. the producers of the articles that we distribute) either inside of outside the European Union. The possible transfer outside the EU shall be governed by specific contracts that will compel the recipient to the respect of the adequate guarantees provided for by the applicable rules and regulations.

7. RIGHTS OF THE DATA SUBJECT

Pursuant to art. 15 of the GDPR, shall have the right to:

- a) obtain confirmation as to whether personal data concerning you do exist or not, even if not recorded yet, and their communication in intelligible form;
- b) obtain indication:
 - a. of the source of the personal data;
 - b. of the purposes and methods of processing;
 - c. of the logic applied in case of processing performed with the help of electronic tools;
 - d. of the details of the controller, the processors and of the designated representative pursuant to art. 3 paragraph 1 of the GDPR;
 - e. of the persons or categories of persons to whom the personal data may be communicated or who may become aware of the data in their capacity as designated representative in the Country, of data processors or persons tasked with the processing of data;
- c) obtain:
 - a. the update, correction or, should they be interested, integration of the data;
 - b. the deletion, transformation into anonymous form or block of the data processed in breach of the law, including those that do not need to be stored in connection to the purposes for which the data were collected or subsequently processed;
 - c. evidence that the persons the data were disclosed to were made aware of the operations under letters a) and b), also regarding their content (except where said fulfilment should turn out to be impossible or entails use of means manifestly disproportionate to the protected right)
- d) object, in whole or in part:
 - a. for legitimate reasons to processing of personal data concerning you, although pertinent to the purpose of the collection;
 - b. to the processing of personal data that concern you for the purposes of sending commercial material or direct sales material or for the purposes of market surveys or of commercial communication, with the use of automated systems that make calls without an operator, via e-mail and/or by traditional marketing methods over the phone and/or with paper-based mail. We would like to point out that the data subject's right to object, as per point b) above, for the purposes of direct marketing with the use of automated methods shall extend to traditional marketing methods and that, in any case, the data subject shall have the right to exercise his/her right to object, even if only in part. Therefore, the data subject may decide to receive communications only by traditional methods or only by automated methods or neither of the two types of communication.

Where applicable, he/she shall also have the rights of articles 16-21 of the GDPR (right to rectification, right to be forgotten, right to the restriction of processing, right to the portability of data, right to object), as well as the right to lodge a complaint with the Personal data protection authority.

In order to exercise your rights, you may contact FRG also by writing to the e-mail address privacy@fridle.it.