

## PERSONAL DATA PROCESSING POLICY

(ART. 13 EU REG. 2016/679)

Pursuant to EU Regulation No. 2016/679 (hereinafter referred to as GDPR) and the relevant national legislation, this information notice has been drawn up to enable you to know the processing policy of your personal data in the context of your relationship with the Data Controller.

**In order to ensure the best possible consultation of the important information contained in the document, you will find below a general section, followed by specific sections devoted to individual relations with data subjects.**

### GENERAL PART

#### DATA CONTROLLER

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

#### RIGHTS OF THE DATA SUBJECT

You, as the data subject, by sending a request by e-mail to the certified email PEC address [fridlegroup@legalmail.it](mailto:fridlegroup@legalmail.it) or by registered letter with return receipt to the common postal address, have the right to obtain from the Data Controller:

- (art. 15) access to your personal data, information about them, a possible copy of the personal data being processed;
- (art. 16) rectification of inaccurate data or the supplementation of incomplete data;
- (art. 17) the deletion of personal data concerning you;
- (art. 18) the restriction of the processing of your personal data;
- (art. 20) your personal data in a structured, machine-readable format, also for the purpose of communicating such data to another data controller.

You are also entitled to:

- (art. 21) objecting at any time to the processing for reasons relating to your particular situation;
- (art 7, paragraph 3) withdrawing, at any time, your consent, if the processing policy has its legal basis therein; this right may also be exercised by the specific means indicated in the individual sections.

Finally, you may, without prejudice to any other administrative or judicial remedy, lodge a complaint with the Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)) if you deem that the processing violates EU Regulation 2016/679.

#### PERSONAL DATA PROCESSING MODES

Processing may be carried out using both paper and computer and/or telematic tools, with organisational methods and logics strictly related to the purposes indicated, in full compliance with the protection principles laid down by the GDPR.

### SECTION 1 - COMMERCIAL RELATIONS

#### DATA CATEGORY AND PROCESSING PURPOSES

Processing relates to your common personal data (identification and personal data such as name, surname, telephone number, mobile phone number, ordinary e-mail address, tax code and residence) and personal data of special categories, which are necessary to fulfil the commercial relationship.

The purpose of processing is:

- a) To propose or enter into a commercial contract;
- b) To fulfil the obligations arising from the commercial contract, as well as carry out all activities related to and necessary for its performance;
- c) To manage legal, tax and fiscal aspects of the commercial relationship;
- d) To manage the archiving and storage of data, information, communications, including electronic communications, and documents relating to the commercial relationship.

#### **LEGAL BASIS FOR PROCESSING**

The legal basis for processing common personal data, as indicated by points a) b) c) d), is:

- i. the fulfilment of the commercial contract conferred to the Controller, pursuant to art. 6, paragraph 1, lett. b) of the GDPR;
- ii. the fulfilment of a legal obligation that the Controller is subject to, pursuant to art. 6, paragraph 1, lett. b) of the GDPR.

#### **PROVISION OF DATA AND REFUSAL**

The provision of common personal data for purposes a), b), c), d) is a legal obligation and a necessary requirement for the conclusion and execution of the contract. Failing this, it will not be possible for the Controller to manage the commercial relationship.

#### **COMMUNICATION OF DATA**

Your personal data may be disclosed to:

1. tax consultants, tax advisors or other professionals who provide the Controller with functional services for the purposes indicated above;
2. banking or insurance institutions or other service companies providing functional services for the above-mentioned purposes;

The following persons may also become aware of your data stored in our systems:

3. Providers of electronic communication services and computer and telematics services for data storage, processing and management;
4. Providers of computer system maintenance services.

#### **DATA RETENTION PERIOD**

Common personal data are retained for the duration of the commercial relationship and, thereafter, for as long as the data controller is subject to retention obligations for tax or other purposes, provided for by law or regulation, and in any case for as long as necessary for their legal protection.

## **SECTION 2 - RELATIONS WITH SUPPLIERS OF GOODS AND SERVICES**

#### **DATA CATEGORY AND PROCESSING PURPOSES**

Processing relates to your common personal data - personal and contact data - and the purposes are:

- e) Fulfilling obligations arising from the contractual supply relationship;
- f) Managing legal, tax and fiscal aspects of the contractual supply relationship;
- g) Managing the archiving and storage of data, information, communications, including electronic communications, and documents relating to the supply contractual relationship.

#### **LEGAL BASIS FOR PROCESSING**

The legal basis for processing, as set out in points e), f) and g) is governed by art. 6 para. 1 lett. B and C: fulfilment of contract; fulfilment of legal obligation that the data controller is subject to;

#### **COMMUNICATION OF DATA**

Your personal data may be disclosed to:

1. tax consultants, tax advisors or other professionals who provide the Controller with functional services for the purposes indicated above;
2. banking or insurance institutions or other service companies providing functional services for the above-mentioned purposes;

The following persons may also become aware of your data stored in our systems:

3. Providers of electronic communication services and computer and telematics services for data storage, processing and management;
4. Providers of computer system maintenance services.

### **PROVISION OF DATA AND REFUSAL**

The provision of common personal data under purposes e), f) and g) is a legal obligation and a necessary requirement for the conclusion and execution of the contract. Failing this, it will not be possible for the Controller to manage the contractual supply relationship.

### **DATA RETENTION PERIOD**

The data are retained for the duration of the commercial supply relationship and, thereafter, for as long as the data controller is subject to retention obligations for tax or other purposes, provided for by law or regulation, and in any case for as long as necessary for their legal protection.

## **SECTION 3 - SEEKING AND SELECTING PERSONNEL**

### **DATA CATEGORY AND PROCESSING PURPOSES**

Processing relates to your common personal data (identification and personal data such as name, surname, telephone number, mobile phone number, ordinary e-mail address, tax code and residence) and personal data of special categories. The purpose of processing is:

- h) Planning and carrying out personnel recruitment and selection;
- i) Ascertaining aptitude for work;
- j) Managing the archiving and storage of data, information, communications including electronic communications and documents relating to your application.

### **LEGAL BASIS FOR PROCESSING**

The legal basis for the Processing is art. 6 para 1 lett. a of the GDPR EU Regulation No. 2016/679 with regard to your common personal data, art. 9 paragraph 2 lett. a of the GPR with regard to your special personal data category, i.e. your **consent to** Personal Data Processing.

Once you have given your consent to the processing of special personal data categories for the purposes identified above, the processing of your data will be legitimised until you withdraw it.

### **PROVISION OF DATA AND REFUSAL**

Providing common personal data and special category data for purposes h), i) and j) is optional, but failure to do so will make it impossible for the Controller to carry out the relevant activities.

### **WITHDRAWAL OF CONSENT**

Consent granted may be withdrawn at any time, pursuant to art. 7, para. 3, via the general tool for exercising the Rights of the Data Subject, or by sending an e-mail to [risorseumane@fridle.com](mailto:risorseumane@fridle.com).

In any case, withdrawing consent does not affect the lawfulness of processing based on consent given prior to withdrawal.

### **EXPRESSION OF CONSENT TO PROCESSING**

If you would like to submit your application by e-mail to the address provided at [www.fridle.com](http://www.fridle.com), under "Contact", please include the following in the text of the accompanying e-mail: "*I expressly give my consent in accordance with articles 6 par.1 lett. a and 9 par.2 lett. a of the GDPR for FRIDLE GROUP S.R.L. to process my data for the purposes of this job application*". Consent may also be given by clicking the appropriate box in the form on the website in the "Work with us" area, where you can upload and send your Curriculum Vitae.

In the absence of such an expression of consent, it will not be possible to process your request and your data will not be included in the data controller's archives.

### **COMMUNICATION OF DATA**

Your personal data may be disclosed to:

1. professionals or other service companies that provide the Controller with functional services for the purposes indicated above.

The following persons may also become aware of your data stored in our systems:

### **FRIDLE GROUP S.R.L.**

Via G. Galilei, 53 36030 Costabissara (VI) | T. +39 0444 971856 | F. +39 0444 971846 | [info@fridle.com](mailto:info@fridle.com) | [fridle.com](http://fridle.com)  
C.F. e P.IVA 02135370241 | SDI RR66BDG | REA VI - 208797 | CAP.SOC. 500.000,00 | [fridlegroup@legalmail.it](mailto:fridlegroup@legalmail.it)  
Società sottoposta alla direzione e coordinamento di Effe Holding S.r.l.

2. Providers of electronic communication services and computer and telematics services for data storage, processing and management;
3. Providers of computer system maintenance services.

Your data will not be disclosed, disseminated or transferred to third countries or international organisations.

#### **DATA RETENTION PERIOD**

Common personal data are retained for the duration of the commercial relationship and, thereafter, for as long as the data controller is subject to retention obligations for tax or other purposes, provided for by law or regulation, and in any case for as long as necessary for their legal protection.

### **SECTION 4 - INFORMATION SERVICES - NEWSLETTER**

#### **DATA CATEGORIES AND PROCESSING PURPOSES**

Only with your express and informed consent, your common personal data (first name, last name, e-mail address, postal address, mobile phone number if given) will be processed for the following purpose:

- k) subscription to the newsletter, the subject of which is the promotion of the Controller's services, by sending information via e-mail

#### **LEGAL BASIS FOR PROCESSING**

The legal basis for the Processing referred to in point k) is article 6 paragraph 1 letter a of the GDPR EU Regulation No. 2016/679, i.e. your **consent** to Personal Data Processing. Once you have given your consent to the processing of common personal data for the purposes identified above, the processing of your data will be legitimised until you withdraw it.

#### **PROVISION OF DATA AND REFUSAL**

The provision of data, and thus consent for its collection and processing, is optional. Withholding consent will, however, make it impossible to provide you with information on services of the Controller available to you.

#### **WITHDRAWAL OF CONSENT**

You may at any time withdraw your previously granted consent in accordance with article 7, paragraph 3, using the general tool for the exercise of the Data Subject's Rights, or using the appropriate [LINK](#) at the foot of each communication.

#### **COMMUNICATION OF DATA**

Your personal data may be communicated to parties with whom it is necessary to interact for the above-mentioned purposes, such as providers of the web/mail service, site updating and maintenance service, communication and marketing services.

All external parties who will have access to your data are prohibited from using them for purposes other than those set out in this notice.

#### **DATA RETENTION PERIOD**

Your data is stored until you withdraw your consent for the processing of your data for the individual purposes indicated.