

## 1. Introduction

We, Italcap s.r.l., take protection of your personal data (hereinafter the "Data") very seriously. The following Privacy Policy (hereinafter "Policy"), in compliance with the General Data Protection Regulation (UE) 2016/679 concerning the protection of natural persons with regard to the processing of personal data (hereinafter "GDPR"), provides an overview of how we ensure this protection and what kind of Data is processed for that purpose.

Please note that this Policy contains the information required by art. 13 of GDPR, which is applicable in all the Member States of the European Union and belonging to the European Economic Area from May 25, 2018.

## 2. General information

We inform you that the treatment of Data will respect the principles of fairness, legality and transparency and protection of your privacy and your rights.

## 3. Data Controller, Joint Controller, Data Protection Officer

The Data Controller is Italcap s.r.l., that is responsible for the legitimate and correct processing of your Data. It is possible to contact the Data Controller using the following:

- Via Martiri delle Foibe, 6-8 13044 Crescentino (VC)
- [info@italcap.com](mailto:info@italcap.com)

We also inform you that there isn't any Joint Controller and we're not obliged to designate a Data Protection Officer.

## 4. Data collected, processing means and Data processing purposes

The Data provided (name, surname, VAT, postal address, e-mail address, phone number, mobile number, data bank and any further Data requested, if necessary) will be processed by the Data Controller using both paper and electronic means; Data are processed using strong technical and organizational security measures to protect Data against unauthorized disclosure or another risks. We also inform that we don't use the Data provided to profile the Data Subjects.

### 4.1. Data collected, Data processing purposes

The Data provided will be processed by the Data Controller according to the GDPR only for the following purposes:

- to ask you commercial offers
- to prepare and to send to you purchase orders or contracts for products and/or services
- to pay your commercial invoices
- to communicate with the Suppliers about orders or contracts (e.g., scheduling, Quality System Management, meetings, payments)
- other activities related to the orders, contracts or to the law (e. g. to comply with applicable administrative, accounting, and tax regulations) even with the cooperation with data recipients (see point 5)

GDPR is referred only to the protection of data related to natural persons; in case of Company, we use Data referred to the Company employees, so please inform them that their Data provided (name, surname, postal address, e-mail address, phone number, mobile number) will be processed by the Data Controller (see point 3) only for the following purposes:

- to send and receive communications and documents to prepare and to manage commercial offers, purchase orders, documents of transportation, commercial invoices and any other documents necessary to provide our products or services
- to respond to request for information and/or contact, also by sending communications and information relating to orders (e.g. scheduling, Quality System Management, meetings, payments)

### 4.2. Further processing

We inform you that Data can be processing by the Data Controller to defend its rights; moreover, we inform you that Data can be transferred to public authority if requested.

## 5. Data recipients, transfer of Data to Third Countries or International Organizations

In order to satisfy the Data processing purposes referred to in point 4, the Data may be processed by Italcap s.r.l. employees; in this case, we ensure that only relevant individuals, who act within their job description and have a need-to-know interest in accessing any of your Data, will have access to the Data for which they have sufficient clearance.

Your Data may also be communicated to recipients directly affected by the treatments, that will treat your Data as a Data Processor.

Your Data will also be made accessible to third parties who perform maintenance and technical assistance on the IT systems used for the processing and storage of Data, who will be nominated by Italcap s.r.l. as Data Processors.

Your Data may also be communicated to authority in compliance with Italian Law.

Your Data won't be transferred by Italcap s.r.l. to third countries or international organizations and such Data won't be disseminated in any way.

The updated list of Data Processors will be made available upon request to the Data Controller to be sent by e-mail to the address shown in point 3.

**6. Data retention period**

Data collected in relation to the methods described above will be stored in Italcap s.r.l. systems (electronic data) or archives (data on paper) and will be retained for the period of time strictly necessary to execute your request or for the duration of the contractual relationship; moreover, they will be retained for the time established by Italian Law, if necessary.

Data of whom contacted Italcap s.r.l. without any further commercial relationship will be retained for a period of time related to the purposes listed in point 4 above; once the maximum Data retention period has elapsed, Data will be deleted/destroyed.

**7. Lawfulness of processing, mandatory or optional nature of Data provision and consequences of any refusal**

The provision of Data is optional but necessary for the purposes listed in point 4 and they won't be used to marketing activities; otherwise, Data processing is necessary:

- for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract
- for compliance with a legal obligation to which the Data Controller is subject
- for the purposes of the legitimate interests pursued by the Data Controller

Refusal to provide the Data will not allow to have any commercial relationship with you.

**8. Rights of the Data Subject**

According to GDPR, we inform you that:

- You may access your Data to check and review such Data
- You may request a copy of your Data
- You may demand that Italcap s.r.l. supplement, correct or delete, cease or restrict the collection, processing, use or disclosure of your Data; the right of rectification also comprises the right to have incomplete Data completed, including by means of providing a supplementary statement
- when applicable, at any time, you may withdraw your consent to the processing of your Data for the purposes referred to in point 4 above, without thereby affecting the legality of the processing based on your consent before the revocation
- You may object to the processing of your Data
- You may request to receive your Data in a structured, commonly used and machine-readable format
- You have the right to lodge a complaint with a supervisory authority in relation to the processing of your Data

The exercise of the preceding rights is not subject to any form constraint and is free. To this end, you can contact the Data Controller mentioned in point 3 above by sending a letter or an e-mail using the addresses indicated in point 3 above.

**9. Policy update**

This Policy is updated in May 22, 2018; Data Controller can update this Policy in any time, publishing it on Italcap s.r.l. website. Data Subjects are invited to check periodically Italcap s.r.l. website in order to be informed if this Policy has been updated.

If Data Subjects don't agree with the updated Policy, he can ask to Data Controller to delete his Data, without thereby affecting the legality of the processing based on previous Policy version.