**PRIVACY POLICY***(Artt. 13-14 EU Regulation 2016/679 and Legislative Decree 196/2003 and subsequent amendments)*

Dear data subject,

below, we provide you with some information that is necessary to bring to your attention, not only to comply with legal obligations but also because transparency and fairness towards data subjects are fundamental aspects of our business.

**Data controller**

The Data Controller for your personal data is **Maglificio Ferdinanda di Fiorin & Tomasin Srl**, who is responsible for the legitimate and proper use of your personal data. You can contact them for any information or requests using the following contact details:

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| --- | --- |
| VAT number | 01115160267 |
| Address | Via Casere 9, 31028 Vazzola (TV) |
| Phone | 0438 441474 |
| E-mail | maglificio@maglificioferdinanda.com |
| PEC | maglificioferdinanda@ecpec.it |

**Categories of Processed Data and Data Source**

For the processing, the Data Controller will process common data, including: personal details, contact information, address details, payment data, data related to purchases or use of services, access, and identification data. The processed data is provided by you and/or by third parties, such as authorities and public entities (e.g., Chamber of Commerce), and/or collected from publicly accessible sources.

**Processing**

Your personal data is collected and processed through automated, semi-automated and non-automated methods, as specified below:

|  |  |  |  |
| --- | --- | --- | --- |
| **Processing** | **Purposes** | **Legal basis** | **Data retention\*** |
| Client Management | Managing customer relationships; Following up on customer or potential customer requests and managing pre-contractual or contractual obligations | Execution of the contract or pre-contractual measures | 10 years from the year of contact or termination of the last contract |
| Front office | Monitoring individuals entering the company; Call filtering | Pursuing the legitimate interest of the Data Controller in the correct management of logistical and organizational needs and in controlling access to company premises | 1 year from the year of data acquisition |
| Sales and Pre-Sales Commercial Activities | Promotional activities; Offering goods and services | Execution of the contract or pre-contractual measures; Pursuing the legitimate interest of the Data Controller in promoting its activities | 10 years from the relevant year |
| Quality of Service | Verifying the quality of the service | Pursuing the legitimate interest of the Data Controller in verifying compliance with internal procedures | 10 years from the year of termination of the last contract |
| Courses and Events | Organization and delivery of courses and events | Execution of the contract or pre-contractual measures | 10 years from the year of the course |
| Audio-Video and Photographic Recordings and Subsequent Publication | Sponsorship of the activities of the data controller | Consent of the data subject\*\* | Until the revocation of consent. Then, the processing will be limited to mere retention for 10 years from the year in which consent was revoked |
| Invoicing and Delivery Notes | Dispatch of documents and goods | Execution of the contract or pre-contractual measures | 10 years from the year of termination of the last contract |
| Accounting | Maintenance of accounting records; Tax compliance | Compliance with a legal obligation | 10 years from the relevant year |
| Management Control | Internal management control of the company | Pursuing the legitimate interest of the Data Controller in verifying business activities | 10 years from the relevant year |
| Management and Maintenance of IT Systems | Management and maintenance of the network and information systems | Pursuing the legitimate interest of the Data Controller; Compliance with a legal obligation (limited to what is required by regulations regarding system administrators) | 2 years from the year of termination of the contractual relationship for accounts, passwords, and usernames; 18 months for compliance related to system administrators |
| Defense of Interests and Rights of the Data Controller | Preventing and/or detecting possible abuses and defending the rights and interests of the data controller | Pursuing the legitimate interest of the Data Controller in protecting its rights and interests in legal proceedings or in the preliminary stages of their possible initiation | Data will be retained as long as the Data Controller or a third party has an interest in exercising their right or interest |
| Management of Compliance with Personal Data Protection | Managing compliance with personal data protection requirements | Compliance with a legal obligation | 10 years from the year of information collection |

**\*** In addition to the time required for the expiration of the statute of limitations in relation to mutual rights and the backup retention period.

**\*\*** If you do not provide consent, your personal data will not be processed for the specified purposes. Consent can be revoked at any time by contacting the Data Controller using the contact details mentioned above.

**Data provision**

For the purposes mentioned above, the provision of your data is a necessary requirement; failure to provide the data may make it impossible to carry out the processing.

**Recipients of Data**

Your data may be disclosed exclusively for technical and operational needs strictly related to the aforementioned purposes, to individuals processing data under the authority of the data controller, appointed as authorized processors pursuant to Art. 29 of EU Regulation 2016/679, to individuals processing data on behalf of the data controller, appointed as data processors pursuant to Art. 28 of EU Regulation 2016/679, as well as to public entities for whom there is a legal obligation to communicate.

**Data transfer outside the EU**

The processing of personal data (e.g., storage, archiving, and data retention on servers or in the cloud) will be limited to the circulation and processing areas of personal data within the countries belonging to the European Union. There is an explicit prohibition on transferring data to non-EU countries that do not ensure (or in the absence of) an adequate level of protection, or in the absence of protective measures provided by EU Regulation 2016/679 (a third country deemed adequate by the European Commission, group Binding Corporate Rules, standard contractual clauses, data subject consent, etc.).

**Rights of the data subject**

* You have the right, as provided by Articles 15 and following of EU Regulation 2016/679, to request from the Data Controller access to your personal data, as well as their rectification, erasure, or the right to be forgotten.
* You also have the right to request data portability or the restriction of processing;
* For reasons related to your specific situation, you have the right to object to the processing based on the legitimate interest of personal data concerning you;
* For processing based on consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
* You can also lodge a complaint with the Data Protection Authority, located at Piazza Venezia 11, 00187 – Rome – protocol@pec.gdpd.it.

To exercise your rights or to request additional information, you can contact the Data Controller using the contact information provided above.

**Changes to this Privacy Policy**

We reserve the right to update our Privacy Policy. Changes will be communicated in the most appropriate manner, and we will update the date in this Privacy Policy. Therefore, we recommend periodic review of our Privacy Policy, also by requesting a copy from the Data Controller.

Last updated 05/02/2024