



LIOFILCHEM, pursuant to articles 4 and 28 of Legislative Decree no. 196 of 30 June 2003 - Privacy Code (hereinafter "Code"), as amended by Legislative Decree 101/2018 and articles 4, no. 7) and 24 of EU Regulation 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (hereinafter, "EU Regulation") informs you pursuant to art. 13 of the Code and of the EU Regulation to be the owner of your personal data and that it will proceed with the related processing for the purposes and in the manner indicated below.

*Processing of personal data means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, limitation, erasure or destruction.*

We therefore inform you that such data will be processed manually and/or with the support of computer or telematic means for the following purposes.

#### **A. Purpose of the processing of personal data.**

A1) To manage the execution of pre-contractual activities, as well as to manage the execution and fulfilment of contractual obligations mutually assumed. Order management and provision of services and products, invoicing/payments and provision of consultancy, technical assistance, customer care and training services. Sending Service Communications

- o Legal basis: (Art. 6 (1) (b) GDPR) Fulfilment of a contract

A2) Manage the archiving and storage of documents, data, information and communications, including electronic ones, relating to the business relationship

- o Legal basis: (Art. 6(1)(c) GDPR) Processing necessary for compliance with a legal obligation to which the Data Controller is subject

A3) Send communications regarding the services offered, newsletters and personalized news, containing material and promotional initiatives of its activities, products and services (e.g. invitations to training courses, events, seminars, conferences, offers and promotional campaigns, etc.) by traditional means (telephone calls with an operator) or by automated methods (e-mail);

- o Legal basis: (Art. 6, paragraph 1, letter f), GDPR) Processing necessary for the pursuit of the legitimate interest of the Data Controller related to the organizational, administrative, financial and accounting management of its organization

#### **B. Communication and dissemination of personal data for the pursuit of the primary purposes of the processing.**

In all the cases described above, LIOFILCHEM may communicate personal data externally to third parties to whom the communication is necessary for the fulfilment of the obligations deriving from the contractual activities and the legal requirements.

In addition, for the pursuit of primary purposes, the data may be communicated to any other third party when the communication is mandatory by law or to correctly perform services in any case provided for by the regulations or by the conditions of the Services provided.

With reference to art. 13 of EU Regulation 679/2016, Legislative Decree 196/2003 as amended by Legislative Decree 101/2018, the subjects or categories of subjects who may become aware of the user's personal data as data processors or persons in charge are indicated below and a specific list by category is provided below:

- Personnel of the Data Controller, appointed as data processor;
- third parties involved by the Data Controller, appointed as data processors;

Personal data will not be disseminated.

#### **Bi. Mandatory or optional consent for the pursuit of the primary purposes of the processing of personal data.**

Without prejudice to the autonomy of the data subject, the provision of personal data may be: mandatory, based on Italian or EU law, regulations or legislation (e.g. tax and accounting obligations); strictly necessary for the conclusion of new contractual relationships or the execution of existing legal relationships; optional, as in the case of processing for the purpose of carrying out information and advertising promotion activities.

Any refusal by the interested party to provide the requested personal data will determine, if they are mandatory by law, consequences provided for by the specific regulations; if they are necessary for the conclusion of new contractual relationships, the impossibility for the firm to provide the requested services or to perform the services for which knowledge of the data is objectively indispensable; if they are optional, there are no consequences.

#### **C. Retention Periods of Data and Other Information.**

The data will be stored for the time defined by the relevant legislation, which are specified below pursuant to art. 13, paragraph 2, letter (a) of the EU Regulation.

The data will be kept for the period of time necessary for the performance of the contracted services.

In addition, the five-year or ten-year terms of retention of documents and related data of a civil, accounting and tax nature remain unaffected, as provided for by the laws in force.

Pursuant to art. 13, paragraph 1, letter (f) of the EU Regulation, we inform you that all data collected will not be transferred to a third country or to an international organization outside the European Union.

#### **D. Data Controller and Data Processors.**

The identification details of the Data Controller are as follows:

LIOFILCHEM SRL with registered office in Via Scotia, Roseto degli Abruzzi (TE) CAP 64026 P.IVA 00530130673 e-mail: [liofilchem@liofilchem.com](mailto:liofilchem@liofilchem.com)

The updated list of Data Processors is available at the indicated location.

#### **E. Exercise of rights by the data subject.**

Pursuant to Article 7 of Legislative Decree 196/2003 (*Right of access to personal data and other rights*), as amended by Legislative Decree 101/2018 and pursuant to Articles 13, paragraph 2, letters (b) and (d), 15, 18, 19 and 21 of the EU Regulation, the interested party is informed that:

1. You have the right to obtain confirmation of the existence or otherwise of personal data concerning you, even if not yet recorded, and their communication in intelligible form.

2. You have the right to obtain the indication:

- a) the origin of the personal data;
- b) the purposes and methods of the processing;
- c) the logic applied in the case of processing carried out with the aid of electronic tools;
- d) the identification details of the Data Controller, the Data Processors and the Designated Representative pursuant to Article 5, paragraph 2;
- e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representative in the territory of the State, managers or persons in charge of the processing.

3. You have the right to obtain:

- a) the updating, rectification or, when interested, the integration of the data;
- b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed;
- c) certification that the operations referred to in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfilment proves impossible or involves the use of means manifestly disproportionate to the right protected.

4. You have the right to object, in whole or in part:

- a) for legitimate reasons, to the processing of personal data concerning him/her, even if pertinent to the purpose of the collection;
- b) to the processing of personal data concerning him/her for the purpose of sending advertising material or direct sales or for carrying out market research or commercial communication.

The exercise of rights is not subject to any formal constraints, it is free of charge and can be exercised by contacting the LIOFILCHEM Privacy Representative, who can be contacted as follows:

**Phone:** +39 085 8930745

**e-mail:** [privacy@liofilchem.net](mailto:privacy@liofilchem.net)

For the sake of usefulness, Article 7 of the Privacy Code is reported in full below, while Articles 15 to 23 of the EU Regulation can be consulted at this link: <http://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679&from=IT>