

Privacy Notice pursuant to Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR)

CUSTOMERS

Pursuant to and for the purposes of art. 13 of European Regulation No. 2016/679 (hereinafter the “**Regulation**”) we are providing the following information regarding the processing of personal data provided to us in the course of the business relationship with our Company.

Data Controller

The Data Controller, meaning the entity that determines the purposes and means of the processing, is A.D.E.A. AMIDI DESTINE ED AFFINI S.r.l. (Tax Code and VAT No. 01674840127), with its registered office in Busto Arsizio (VA), Via Baden Powell, 5, phone +39 0331 341949, email amministrazione@adea-srl.it, certified email (PEC) adeasrl@certimprese.it (hereinafter the “**Company**”).

Personal data being processed

The processing will concern the following data:

- in the case of an individual business client: first name, last name, company name, registered office, telephone numbers, email addresses, tax code and VAT number, and any banking information (hereinafter referred to as the “**Client Data**”);
- the personal data of the contact persons of the client company/business: first name, last name, email address, company or business to which they belong, and their role or job title (hereinafter, collectively, the “**Data**”).

Purpose of the processing and legal basis of data processing

PURPOSE <i>why the company processes your personal data</i>	LEGAL BASIS <i>(legal basis for processing)</i>
Offer preparation	Execution of pre-contractual measures adopted at the request of the data subject (Art. 6(1)(b) of the Regulation)
Execution of the supply	Execution of the contract, and fulfilment of related obligations to which the Company is subject (Art. 6(1)(b) and (c) of the Regulation)
Fulfilment of administrative, accounting, and tax obligations	
Fulfilment of additional legal and contractual obligations related to the relationship	
Entry and/or updating of customer records	Legitimate interest of the Company (Art. 6(1)(f) of the Regulation)
Exercise and defense of the Company’s rights in any venue, including judicial, administrative, arbitration, and/or mediation and conciliation procedures	

The processing of personal data for purposes other than those indicated above may be subject to a specific and separate privacy notice (by way of example: video surveillance notice, access control notice, etc.).

Processing methods

As part of the purposes set above, the data will be processed in paper form and electronically, in compliance with legal provisions on the processing of personal data, and appropriate security measures will be taken.

The Data processing is carried out exclusively by the Company’s internal staff, who are involved in activities related and instrumental to the management of the employment relationship. Such staff are specifically authorized, trained, and instructed to ensure adequate security and confidentiality of the Data, as well as to prevent the risk of loss and/or destruction and access by unauthorized persons.

Communication and dissemination of data

To the extent strictly relevant to the purposes set above, the Data may be disclosed to:

- Public Administration bodies in compliance with specific legal obligations, including in the event of audits and inspections;
- Credit and/or insurance institutions.

The Data may also be disclosed to subjects specifically appointed as Data Processors (individuals or entities that

process data based on documented instructions from the Company, such as, by way of example, those responsible for the management and maintenance of IT systems, payroll consultants, tax advisors, IT service providers, etc.). The updated list of appointed Data Processors is available at the Company's headquarters.

Data retention period

Your Data will be retained for the entire duration of the contractual relationship and, in any case, until the rights arising from that relationship have expired (up to a maximum of 10 years) without prejudice, in any case, to compliance with legal retention obligations or an extension of the retention period if necessary for the establishment, exercise, or defense of a legal claim.

Nature of the provision of data

The provision of your Data is mandatory and strictly necessary in order to comply with legal obligations related to the management of the contractual relationship and, in particular, for the fulfilment of legal, tax, social security, and contractual obligations.

Therefore, the failure to provide, even partially, your Data will make it objectively impossible to establish and execute the contractual relationship, as well as to properly carry out all related obligations

Data subject's rights

The data subject has the right to request from the Company, in accordance with the procedures set out in the Regulation and without prejudice to the provisions and limitations set forth in Legislative Decree No. 196/2003 (Part I – Title I – Chapter III):

- **access** to their personal data, in the cases provided for (Article 15 of the Regulation);
- **rectification** of inaccurate Data and the **completion** of incomplete Data (Article 16 of the Regulation);
- **erasure** of the Data, under the conditions provided for (Article 17 of the Regulation), for example when the Data is no longer necessary in relation to the purposes outlined above or is processed unlawfully in breach of the Regulation;
- **restriction of processing**, under the conditions provided for (Article 18 of the Regulation), for instance when the accuracy of the Data is contested and verification is required;
- **data portability**, meaning the right to receive, in the cases provided for (Article 20 of the Regulation), the Data in a structured, commonly used and machine-readable format, and to transmit such Data to another data controller;
- **objection to processing**, in the cases provided for (Article 21 of the Regulation).

To exercise the rights listed above, the data subject may send a communication to the Company by email at privacy@adea-srl.it or by registered letter to the Company's address.

Complaint

Should you believe that the processing of your Data infringes the provisions of the Regulation, you have the right to lodge a **complaint** with the Data Protection Authority, in accordance with Article 77 of the Regulation.

Transfer of Data abroad

Your Data is stored at the Company's registered office and on servers located within the European Union. Busto Arsizio, 02/04/2024

A.D.E.A S.r.l.