

## CUSTOMER INFORMATION

The firm **Pertinger S.r.l.**, having its registered offices in Via Plattner, 2 - 39040 Varna (BZ), as the data Controller (henceforth "**the Controller**"), informs you as per Art. 13 of European Union Regulation No. 2016/679 (henceforth "**GDPR**") that your personal data collected will be handled and used for the following purposes:

### 1. Subject of processing

The Controller handles personal identity data (for example name, surname, company name, address, telephone number, e-mail, bank and payment details - henceforth "**personal data**" or simply "**data**") provided by you when defining the contract for the Controller's products or services.

### 2. Purpose of processing

Your personal data is handled:

**A)** Pursuant to Art. 6, chap. b) and c) of the GDPR, for the following purposes:

- Implementation of the contractual agreement with you, or execution of pre-contractual measures adopted on your request;
- Fulfilment of pre-contractual, contractual and fiscal obligations deriving from the existing relationship with you;
- Fulfilment of legal obligations, regulations, EC norms or orders from an authority (such as for example under anti-laundering rules);
- Execution of the Controller's rights, for example the right of defence by judiciary;

We would like to inform you that if you are already one of our customers, we may send you commercial material relating to the Controller's products or services, similar to those already purchased by you from our company in a previous transaction, unless you have requested otherwise.

**B)** Only if your explicit consent has been given (GDPR Art. 7), for the following marketing purposes:

- Send you e-mails, post and/or SMS and/or telephone calls, newsletters, marketing communication and/or advertising material on products or services offered by the Controller, as well as satisfaction surveys relating to the quality of products/services;
- Send you e-mails, post and/or SMS and/or telephone calls, marketing and/or advertising communications from third parties (for example business partners, insurance companies).

### 3. Processing methods

The processing of your personal data is by one of the methods indicated in Art. 4, point 2) of the GDPR, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data. Your personal data is processed both electronically or as a hard copy, whether or not by automated means.

The Controller will process personal data for the period required for the execution of the purposes detailed above, and in any case for no more than 10 years from the end of the relationship in the purpose above, and for no longer than 3 years from the collection of the data for marketing purposes.

#### **4. Access to Data**

Your personal data may be made accessible for the purposes detailed in Art. 2 paragraphs A) and B):

- to employees and collaborators of the Controller in Italy and abroad, in so much as authorised parties and/or internal representatives for processing and/or system administrators;
- to third party companies or other subjects (for example, credit brokers, professional studios, consultants, insurance companies providing insurance services, etc.) that carry out outsourcing activities on behalf of the Controller, in their role as external processing managers.

#### **5. Communication of data**

Without the requirement for express consent (as per Art. 6 par. b) and c) of GDPR), the Controller may communicate your data for the purposes indicated in Art. 2 A9 to security organisations, judicial authorities, insurance companies providing insurance services, as well as subjects to which communication is required by law for the completion of the aforementioned purposes. These subjects will process the data autonomously as data Controllers.

Your data will not be diffused.

#### **6. Transfer of data**

Personal data is kept on a server located in Varna Bolzano (Italy), inside the European Union. It should be noted however that the Controller, if it deems necessary, reserves the right to move data outside of the European Union. In that case, the Controller shall ensure that the transfer of data outside of the European Union will be in compliance with applicable legal requirements, and subject to the adoption of the standard contractual clauses required by the European Commission.

#### **7. Nature of data provision and consequences of refusal to reply**

The provision of data for the purposes indicated in Art. 2 par. A) is obligatory. Without them, we cannot guarantee execution of the contract detailed in Art. 2 A).

The provision of data for the purposes detailed in Art. 2 B) is optional. You can decide to not provide any data or withdraw consent at a later date for data already provided: in this case you will not receive any newsletters, commercial communications and advertising material relating to the Controller's products and services. Your rights to products and services detailed in Art. 2 A). remain unchanged.

#### **8. Data Subject's Rights**

As an interested party, you have the rights under Art. 15 of the GDPR, specifically the right to:

- i. obtain confirmation as to whether or not personal data concerning him exists, regardless of their being already recorded, and communication of such data in intelligible form;
- ii. obtain indications of: a) the source of personal data; b) the purposes and methods of handling; c) the logic applied in the event of processing being carried out using electronic means; d) the identification details of the Controller, of managers and designated representatives as per Art. 3, paragraph 1 of the GDPR; e) the recipients or categories of recipient to whom the personal data have been or will be disclosed as a designated representative in the State's territory, designated or authorised parties;
- iii. a) updating, rectification or, where interested therein, integration of the data; b) erasure, anonymisation or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed; c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;
- iv. to oppose, in whole or in part; a) for legitimate reasons the processing of personal data held on you, even if relevant to the purpose of its collection; b) the processing of personal data held of you for the sending of advertising material, direct selling or market research and commercial communication via e-mail and / or traditional methods via the telephone and/or physical mail.

Where applicable, you also have the right under articles 16-21 of the GDPR (Right to rectification, Right to erasure, Right to restriction of processing, Right to data portability, Right to object), as well as the right to complain to the authorities.

### **9. Ways of exercising your rights**

You may, at any time, exercise your rights by sending:

- A letter by registered mail to the headquarters of the Controller;
- An e-mail to [dataprotection@pertinger.com](mailto:dataprotection@pertinger.com)

### **10. Controller, responsible and authorised parties**

The Controller of processed data is **Pertinger S.r.l.**, having headquarters in Via Plattner 2 - 39040 Varna (BZ); contact information is available on the company website [www.pertinger.com](http://www.pertinger.com).

The updated list of responsible and authorised parties is kept at the headquarters of the data Controller.