

Complete information for Customers/Suppliers

Who are we and what do we do with your personal information?

EUROGRIFER SRL based in Cornedo (VI) in Via Monte Verlaldo n. 113, as Data Controller, takes care of the confidentiality of your personal data and guarantees the necessary protection from any event that could put it at risk of violation.

EUROGRIFER SRL puts into practice policies and practices with reference to the collection and use of personal data and the exercise of the rights that are recognized to you by the applicable legislation. EUROGRIFER SRL company takes care to update the policies and practices adopted for the protection of personal data whenever this is necessary and in the event of regulatory and organizational changes that may affect the processing of your personal data.

How and why does EUROGRIFER SRL collect and process your personal data?

EUROGRIFER SRL collects and/or receives the information concerning you, which is:

- name, surname
- tax code
- place and date of birth
- nationality
- sex
- physical and electronic address
- landline and/or mobile number
- deriving from your CV
- computer data (deriving from e-mail address and/or access log to dedicated platforms);
- possibly, if required for the performance of the requested service, related to your bank solvency and debt position collected by you directly or at public databases
- social media accounts

Your personal data will be processed for the following purposes:

1) the management of the relationship and consequent fulfilments, including regulatory

Purposes	Legal basis
<ul style="list-style-type: none"> - the management of the relationship established in all its phases - the keeping of company books, records and accounting/tax registers 	<p>Performance of activities deriving from the provision of services</p> <p>Fulfilment of legal obligations deriving from the established relationship, such as, among others, those descending from:</p> <ul style="list-style-type: none"> - Presidential Decree n. 633/1972 and subsequent amendments and additions. <p>As well as those deriving from the application of:</p> <ul style="list-style-type: none"> - Fulfilment of economic-financial and associative reporting obligations

Your data may also be communicated / collected by third parties such as, by way of example:

- other data controllers e.g. financial administration and/or public and/or institutional and/or insurance bodies or similar
- external consultants in accounting and tax matters
- legal consultants
- auditors
- IT service providers

and your data can be obtained by consulting:

- lists kept by public/institutional and/or insurance bodies or similar or under the control of public authorities based on specific national legislation;

EUROGRIFER SRL does not transfer your personal data abroad (non-EU countries).

2) for communication to third parties for the purpose of sending promotional communications of their activities/services

Purposes	Legal basis
Communication to third parties such as: <ul style="list-style-type: none"> • public and/or institutional and/or insurance bodies or similar • external consultants in accounting and tax matters • legal consultants • auditors • IT service providers 	Your consent

Communication regards the data categories listed above and specifically:

- name, surname
- physical and electronic address
- landline and/or mobile number

3) for computer security activities

Purposes	Legal basis
- control and monitoring of the use of equipment and IT infrastructures pertaining to EUROGRIFER SRL	Performance of activities deriving from the established relationship
- implementation of detection procedures and notification of personal data violation (data breach)	Fulfilment of legal obligations (detection and notification of data breach events)
	Legitimate interest

4) for sending promotional communications by EUROGRIFER SRL

Purposes	Legal basis
<ul style="list-style-type: none"> • sending SMS, e-mails, paper mail, phone calls, 	Your consent

Communication regards the data categories listed above and specifically:

- name, surname
- physical and electronic address
- landline and/or mobile number

5) For statistical purposes

Purposes	Legal basis
<ul style="list-style-type: none"> • Statistical analysis by the Data Controller 	Legitimate interest of the Data Controller

How, where and for how long is your data retained?

How

Data processing is performed through paper supports or IT procedures by specifically authorized subjects. They are allowed access to your personal data within the limits and to the extent required for carrying out the processing activities that concern you.

EUROGRIFER SRL periodically verifies the tools through which your data is processed and the security measures established for them which are constantly updated; it also verifies through the subjects authorized for the processing, that personal data that does not need processing and whose purposes are exhausted is not collected, processed, stored or retained; it verifies that data is retained with the guarantee of integrity and authenticity and its use for the purposes of the processing actually performed.

EUROGRIFER SRL guarantees that the data that even after verification, proves to be excessive or irrelevant, will not be used except for the possible retention, in accordance with the law, the deed or document that contain it.

Where

The data is retained in paper, computer and electronic archives; security measures are provided to protect the aforementioned and are located within the European economic area.

How long

Your personal data is retained for the time required to carry out the relationship with EUROGRIFER SRL and for the fulfilments, including legal ones, as well as the exercise of the rights that follow.

Specifically:

<p>Identifying data</p> <p>Tax, administrative/accounting data</p> <p>possibly, if required for the performance of the requested service, related to your bank solvency and debt position collected by you directly or at public databases</p> <p>deriving from your CV</p> <p>social media accounts</p>	<p>Duration of the contractual relationship</p> <p>Without prejudice to</p> <ul style="list-style-type: none"> - the limitation of the processing and other guarantees provided for data relating to criminal convictions and crimes and related security measures - la termination of the relationship (for any reason) - the purposes that continue beyond the conclusion of the report (e.g., bookkeeping, article 2220 of the Civil Code) - the prescription terms: from five to ten years from the definition of the relationship and in any case from the moment in which the rights that depend on it can be exercised (articles 2935, 2946 and 2947, and articles 18 and 22 of the Civil Code) <p>Except for the possible dispute if there is an extension of the aforementioned terms, for the time required to pursue the related purpose</p>
<p>Computer data (access logs to systems and to the network and/or IP addresses IP)</p>	<p>The duration of the retention depends on the presumed and/or detected risk and on the detrimental consequences arising from it, without prejudice to the measures to make the data anonymous or suitable to limit processing.</p> <p>In any case, the data must be retained (starting from the knowledge/detection of the event of danger or of data breach) for the time required to proceed with the notification to the Guarantor of the data breach detected through the procedures implemented by EUROGRIFER SRL and in any case to remedy it</p>
<p>Identifying data (name, surname, physical and electronic address, landline and/or mobile number) for sending promotional communication of services/activities</p>	<p>Without prejudice to the withdrawal of consent in the case provided, the duration of retention is a maximum of 24 months from the provision of consent.</p>

Once all the purposes that legitimize the retention of your personal data are exhausted, EUROGRIFER SRL will take care of deleting it or making it anonymous.

What are your rights?

The rights you are entitled to allow you to always be in control of your data. Your rights are:

- access;
- correction;
- withdrawal of consent
- deletion;
- processing limitation;
- opposition to processing;
- portability.

In essence, you can at any time and free of charge and without specific fees and formalities for your request:

- obtain confirmation of the processing performed by EUROGRIFER SRL;
- access your personal data and know the origin (when the data is not obtained from you directly), the purposes and aims of the processing, the data of the subjects to whom it is communicated, the period of retention of your data or useful criteria to determine it;
- update or correct your personal data so that it is always precise and accurate;
- withdraw consent at any time, if this constitutes the basis of the processing. Withdrawal of consent in any case does not affect the lawfulness of the processing based on the consent given prior to withdrawal;
- delete your personal data from databases and/or backup archives, even if it is no longer needed for the purposes of the processing or if it is assumed to be illegal, and if the conditions established by law still exist; and in any case if the processing is not justified by another equally legitimate reason;
- limit the processing of your personal data in certain circumstances, for example where you have disputed its accuracy, for the period necessary for EUROGRIFER SRL to verify its accuracy. You must be informed, in due time, even when the suspension period has been completed or the reason for the limitation of the processing has ceased, and therefore the limitation itself withdrawn;
- obtain your personal data, if its processing takes place on the basis of a contract and with automated tools, in electronic format also for the purpose of transmitting it to another data controller.

EUROGRIFER SRL must proceed in this way without delay and, in any case, at the latest within one month of receipt of your request. The deadline can be extended by two months, if required, considering the complexity and the number of requests received. In such cases, EUROGRIFER SRL will inform you within one month of receiving your request and also inform you of the reasons for the extension.

For any further information and to send your request, write to EUROGRIFER SRL at the e-mail address amministrazione@eurogrifer.com

How and when can you oppose the processing of your personal data?

For reasons related to your particular situation, you can oppose the processing of your personal data at any time if it is based on legitimate interest, sending your request to EUROGRIFER SRL at amministrazione@eurogrifer.com

You are entitled to the deletion of your personal data if there is no legitimate reason prevailing over the one that gave rise to your request.

Who may you lodge a complaint to?

Without prejudice to any other administrative or judicial action, you may lodge a complaint to the Guarantor for the protection of personal data, unless you reside or do not work in another Member State. In the latter case, or in that in which the violation of the law on the protection of personal data takes place in another EU country, the competence to receive and know the complaint will be of the Supervisory Authorities established therein.

Every update of this information will be communicated to you promptly and by appropriate means and you will be notified if EUROGRIFER SRL follows up on the processing of your data for purposes other than those referred to in this information, before proceeding and in time to give your consent if necessary