

# Privacy policy

Information on the processing of your personal data, pursuant to art. 13 and 14 of the European Regulation 2016/679 (hereinafter "GDPR") concerning the protection of personal data.

We inform you that, with reference to the ongoing contractual relationship with you, our Company disposes of data related to your person, acquired verbally, directly or through third parties, qualified as "personal data" by GDPR, and that such data are treated according to the principles of fairness, lawfulness and transparency, protecting your privacy and your rights.

## **DATA CONTROLLER**

The data controller is DEM S.p.A. with headquarter in Viale del Lavoro 23, Z.I.U. Lauzacco, 33050 Pavia di Udine (UD), Italy, VAT number IT01964930307, e-mail [info@demgroup.com](mailto:info@demgroup.com), PEC [mail@pec.demgroup.com](mailto:mail@pec.demgroup.com)

## **PURPOSE OF THE PROCESSING**

Your data are processed with reference to contractual purposes and for the fulfillment of related legal and fiscal obligations, as well as to allow an effective management of financial and commercial relationships.

The legal basis for the processing is the contract, as well as the explicit consent. Therefore, your data may be processed for the fulfillment of pre-contractual, contractual and tax obligations arising from existing relationships, or for the fulfillment of obligations under national or EU rules, or to grant the data controller the exercise of his rights, for example the right of defense before the Court.

## **CATEGORIES OF DATA PROCESSED**

We process your personal and fiscal data, as well as the economic data that are necessary in carrying out commercial and contractual relationships with you. As a rule, contact details (name, address, telephone number, e-address, mail) and, depending on the purpose, bank and payment details (reference bank and current account) or data available from public sources (e.g. internet or chamber of commerce).

## **METHOD OF TREATMENT**

Data processing is carried out by means of the operations or set of operations referred to in Article 4 No. 2 GDPR (collection, registration, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction) either by paper means, or by electronic, computerized and / or automated means, with an approach strictly related to the purposes set out above and in compliance with the principles imposed by the current legislation on the protection of personal data.

Personal data are processed by persons specifically authorized or designated by the Company within its structure (employees and collaborators, however named), on account of the duties and tasks assigned. Personal data may also be processed by other third parties operating on behalf of the Company under specific contractual obligations or, in any case, duly authorized or appointed (by way of example third parties appointed for specific administrative, processing or instrumental services, necessary for the purposes mentioned above). Data may be entered in related databases to which specifically authorized or designated persons may have access.

The data processing operations are carried out in such a way as to guarantee their integrity, confidentiality and availability. Personal data are protected by appropriate technical and organizational measures, in order to guarantee their security and confidentiality, in compliance with current legislation. The Company has

implemented specific security measures to prevent the loss or destruction of data, unauthorized access, processing that is not permitted or does not comply with the purposes for which it was collected.

#### **DATA RECIPIENTS**

Your data will not be "disseminated" by us, with this term being intended disclosed in any way to an indeterminate number of persons, as well as made available or open for consultation.

Your data may instead be "communicated" by us, with this term being intended disclosed to one or more specific person / entity, for the aforementioned purposes, in the following terms:

- to a person / entity, authorized within our Company to process your data, and in particular to the employees of the Administration Office, to the employees of the Sales Office;
- to a person / entity who can access the data by virtue of law, regulation or EU legislation, within the limits set by such rules;
- to a person / entity who needs access to your data to perform auxiliary tasks related to the contractual relationship between you and us, within the limits strictly necessary to carry out the auxiliary tasks entrusted to them. In particular, the following will be able to access your data: credit institutes, professionals, shippers, agents of our network;
- to our consultants, within the limits necessary to carry out their duties, pursuant to our engagement letter which requires them to comply with the provisions of EU Regulation 679/2016 (GDPR) and any other applicable law, as well as to commit themselves to confidentiality and to security in the processing of your data.

#### **CONSERVATION PERIOD**

The data will be processed for the entire duration of the contractual relationship and also subsequently, for the fulfillment of legal obligations and for administrative and commercial purposes, and in any case for a period not exceeding ten years.

#### **TRANSFER OF DATA ABROAD**

The Company mainly deals with its data within the U.E. Also by virtue of the IT applications used, where necessary, the Company may transfer your personal data to third countries. In any case, we assure you that the transfer and processing of your personal data takes place in compliance with the rules set by the G.D.P.R. (Article 44 et seq.), such as for example the existence of decisions of adequacy of the Commission pursuant to art. 45 of EU Regulation 679/2016, of standard contractual clauses or other guarantees considered adequate.

#### **OBLIGATION OR POWER TO CONFIRM THE DATA, CONSEQUENCES OF THE POSSIBLE REFUSAL**

Failure to provide us with data that we are obliged to know in order to fulfill the obligations set by laws, regulations and EU legislation as well as by provisions adopted by Authorities appointed by law and by supervisory and control bodies, may determine the impossibility to establish or continue the contractual relationship, as long as such data are necessary for the performance of the contract itself. Failure to provide us with data that we are not obliged to know, will be assessed by us on a case- by-case basis, and will determine consequent decisions depending on the importance of the data requested.

#### **YOUR RIGHTS**

As interested parties, we inform you that, in addition to the right to lodge a complaint with the Supervisory Authority, pursuant to art. 15 - 21 GDPR you can assert the rights listed below:

- right of access: the data subject has the right to obtain access to personal data and information concerning the processing, and to request a copy;
- right to rectification: considering the purposes of the processing, the data subject has the right to obtain the the rectification and completion of inaccurate or incomplete personal data, including by means of providing a supplementary statement;
- right to erasure ("right to be forgotten"): the data subject has the right to obtain from the data controller the erasure of personal data concerning him without undue delay and without undue delay the data controller is obliged to cancel the personal data, without prejudice to the exercise of the right to freedom of expression and information, to the compliance with legal obligations or the establishment, exercise or defense of legal claims;
- right to restriction of processing;
- right to data portability: the data subject has the right to receive the personal data concerning him / her, in a structured, commonly used and automatically readable form, and has the right to transmit this data to another data controller without hindrance from the controller to which the personal data have been provided. In exercising his/her rights to data portability, the data subject has the right to, have the personal data transmitted directly from one controller to another, where technically feasible;
- right to object:- the data subject has the right to object to ~~the~~ processing of his/her personal data based on the legitimate interest of the right holder. In this the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.;

In case of infringement of your rights you can lodge a complaint with the Garante per la protezione dei dati personali (also called the Supervisory Authority) at the following addresses: Piazza Venezia 11 - 00187 Rome - [www.garanteprivacy.it](http://www.garanteprivacy.it) - e-mail: [garante@gpdp.it](mailto:garante@gpdp.it) - Fax: (+39) 06.69677.3785 - Telephone switchboard: (+39) 06.69677.1.

To exercise the rights listed above or for further information, you can contact us at: e-mail [info@demgroup.com](mailto:info@demgroup.com), PEC mail [mail@pec.demgroup.com](mailto:mail@pec.demgroup.com), or by registered letter with return receipt to: Viale del Lavoro 23, Z.I.U. Lauzacco, 33050 Pavia di Udine (UD), Italy..

We reserve the right to amend the present information in case of updates of legislation.