

Messrs.
Company
Headquarters

SUBJECT: Information note pursuant to art. 13 of Leg. Decree 196/03 and GDPR EU 2016/679 regarding the protection of personal data processing.

In your capacity as "Data Controller" and "Data Subject, that is the subject to which the data under process is referred to and/or is handled, we would like to inform you about the key elements of the processing performed.

Purpose of processing.

The collection and processing of personal data are carried out in order to:

1. ensure that all operations imposed by regulatory obligations, fiscal and tax rules deriving from the conducting of business, as well as by the requirements concerning anti-money laundering are carried out;
2. establish and execute the ongoing contract relationships;
3. carry out the operations that are strictly linked and instrumental to establish such relationship, including the acquisition of preliminary information in order to stipulate the Contract;
4. manage the relationship with the Client for administration and accounting tasks, as well as orders, shipments, invoicing, services, handling of any dispute;
5. establish the clients' level of satisfaction, compile statistics for internal use;
6. in particular, send marketing or direct sale information material, perform market or business communication researches, both via automated means (emails, other remote communication systems through communication networks, such as, by way of example: sms, mms, whatsapp) both traditional (paper mail) by the Data Controller;
7. potentially assess suppliers according to specification ISO 9001:2015, Leg. Decree no. 196/03 and GDPR EU 2016/679;
8. manage and implement the necessary customs procedures in terms of import/export activities, including storage at customs warehouses and support during inspections by Responsible Authorities;
9. perform the transport, logistics and shipment management services of goods required;
10. store the goods entrusted in depot;
11. perform all the necessary procedures for correct and thorough management of shipments and/or goods in transit;
12. manage and implement the necessary customs procedures in terms of import/export activities, including storage at customs warehouses and support during inspections by Responsible Authorities;

the data will be processed according to the principles of fairness, lawfulness, transparency and the protection of your privacy and rights. The intended contract purpose, as well as that of service provision, trade and non-trade dispute and marketing concern the processing of the personal data of the Client only. The Client's personal data will be processed for the entire duration of the contract and for the subsequent fulfilment of all legal obligations, as well as for future commercial purposes.

Anti-money laundering and anti-terrorism.

Data must be provided as established by the regulation on anti-money laundering and anti-terrorism. Failure to provide such data shall preclude the professional service required and shall entail reporting the operation to the competent supervising authority. As far as this is concerned, it should be pointed out that the processing of personal data in relation to anti-money laundering obligations will be performed by taking into account the specific implementation measures imposed to non-financial operators by the Regulation on the identification and retention of information, pursuant to art. 3, paragraph 2, of Leg. Decree no.56/2004, adopted with Ministerial Decree nor. 143/2006. Other information may be taken from public sources in order to fulfil the obligations provided for by Leg. Decree 231/2007.

Methods of data processing.

The processing of data for the aforementioned purposes is carried out with both automated (by means of electronic or magnetic supports) and non-automated methods (on paper), in respect of the rules of confidentiality and security provided by law, consequent regulations and internal provisions.

Place of data processing.

Data is currently processed and filed at the legal office, Via Feltrina Sud, 95 – 31044 Montebelluna (TV). Furthermore, data is processed on behalf of the writer by professionals and/or companies in charge of technical, development, management and administration-accounting activities.

Obligatory or voluntary nature of providing the requested data.

Some data are fundamental to establish the contract relationship or for its execution, while other may be defined as ancillary for that purpose. The provision of data to the writer is mandatory only for the data for which a regulatory or contract obligation is involved.

Consequences of possible refusal to provide data.

In the cases where providing data is mandatory due to a contract or regulatory obligation, refusal to provide said data could lead the Supplier to not perform or continue the Contract as this would entail illicit processing. In the cases where there is no regulatory obligation to do so, the refusal would not lead to any of the aforementioned consequences but would anyway impede the execution of accessory operations.

Communication of data.

Without prejudice to the communications and disclosures in order to fulfil legal obligations, the data regarding your natural person may be disclosed in Italy and/or abroad to:

- Professionals and consultants, consulting firms, factoring companies, credit institutions, debt collection companies, credit insurance companies, commercial information firms and transport companies;
- public and private entities, even after inspections or checks, such as: Financial administration, Tax Police Service, Judicial Authorities, Italian Exchange Office, Labour Inspectorate, National Health Authority, Social Security Institutions, ENASARCO, Chamber of Commerce etc.;
- Other companies belonging to D.B. Group also with offices abroad (see specific point here below);
- Subjects that may access your data due to law provisions;

Sensitive data, even though processed anonymously, shall not be disclosed and/or transferred, without prejudice to instances of close collaboration with entities for the development, implementation, production and assistance on software developed by us and/or marketed exclusively for the achievement of the purposes indicate in this information notice and prior to your specific written authorization.

Transfer of data to a foreign country.

Clients' data can be disclosed to other companies belonging to D.G. Group, with offices in Third non-European Countries, only for executing the obligations deriving from the service contract of which the Client is a party concerned or to fulfil, before the end of the Contract, the Client's specific requests, that is for concluding or executing a contract stipulated to his benefit (art. 43, point b) Legislative Decree 196/03).

Duration of data retention:

The data provided will be filed in our archives in accordance with the following parameters:

- For administration and accounting activities, as well as orders, quoting and production flow management, assistance and maintenance, shipping, invoicing, services, management of any disputes: 10 years as established by Law with art. 2220 (Italian) Civil Code, without prejudice to any payment delay which would justify the extension;
- For the purposes as per aforementioned point 5 and points from 8 to 12, data must be retained until the end of the contract and/or of the supply relation;
- For marketing purposes (point 6): 24 months;
- For the purpose of evaluating Suppliers (point 7): 36 months;

Data Subject's rights.

With regard to personal data, the Client may exercise the rights established by art. 7 of Leg. Decree no. 196/2003 (see copy duly annexed) within the limits and the conditions set out by arts. 8, 9 and 10 of the aforementioned legislative decree. In the event of subscription of any kind of declaration of consent to the processing requested by D.B. GROUP SPA, it should be noted that the Data Subject may cancel it at any time, without prejudice to the obligations set out by current laws upon the request for cancellation, by contacting the Data Controller at the contact information here below.

Data controller.

The Data controller you can address to in order to exercise your rights pursuant to the aforementioned art. 7 is D.B. GROUP SPA, with offices in Feltrina Sud, 95 – 31044 Montebelluna (TV); Data Controller if the company's ad interim Legal Representative. Said rights may be exercised by you also by sending communications to the following email address: privacy@dbgroup.net.

Montebelluna, 24/11/2017

D.B. GROUP SPA

Annex: Excerpt from "RIGHTS OF DATA SUBJECTS", Leg. Decree no.196/03

Art. 7 - Right of access to personal data and other right

1. The provider of personal data shall have the right to obtain confirmation as to whether personal data concerning him/her exist irrespective of the recording thereof, and to obtain communication of such data in intelligible form.
2. Data subjects shall have the right to information on:
 - a. The source of the personal data that is being processed;
 - b. The purposes and mechanisms of the processing;
 - c. Whether the personal data is being processed electronically and what is the logic underlying the processing;
 - d. The information identifying the Data Controller and/or the Data Processor and/or the representative appointed for the Italian territory;
 - e. The entities or categories the personal data may be disclosed to or become known by to the extent they act as representatives appointed for the Italian territory, Data Processors or Data Controllers.
3. Data subjects shall have the right to information on:
 - a. the updating, correction or, when they are interested, additions to the data;
 - b. the cancellation, transformation into anonymous form, or blocking of data processed in violation of law, including those that need not be retained for the purposes for which the data were collected or subsequently processed.
 - c. certification that the parties to which the data have been transferred or disseminated have been notified of the operations specified in points a) and b), also regarding their content, except for the case where notification proves impossible or requires the use of means clearly disproportionate to the right being protected.
4. The data subject is entitled to fully or partially object:
 - a. for legitimate reasons, to the processing of personal data, [even if pertinent to the purpose of collection];
 - b. to the processing of personal data for the dispatch of advertising or direct sales material or for the conduction of market research or business information.