

Pursuant to Article 13 of Regulation (EU) 2016/679, laying down provisions for the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter also referred to as the "GDPR"), we hereby provide you with the information regarding the processing of your personal data.

### **1. Personal data controller**

The Data Controller is: Havant s.r.l. - Viale Forlanini, 38 - 20024 Garbagnate Milanese (MI), IT

#### **1.1 Data Protection Officer (DPO)**

The Data Protection Officer (DPO) can be reached at the following address:

Havant s.r.l. - Viale Forlanini, 38 - 20024 Garbagnate Milanese (MI)

**Email: DPO@havant.com**

### **2. Categories of personal data processed**

#### **2.1. Personal data provided by you voluntarily**

As part of the processing of personal data, your personal data provided by you directly will be processed. Personal data means "any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person" and images (Art. 4 para. 1 n. 1 GDPR).

### **3. Purposes of the processing of personal data**

Purposes related to the establishment and execution of the contractual relationship between the Customer/Supplier and the Company. Carrying out personal data registration treatments in the company, administrative/accounting management systems such as accounting and treasury management, as well as invoicing (e.g. verification and recording of invoices), in accordance with the requirements of current legislation

#### **3.1 Other purposes**

- a) sending commercial/promotional communications through automated contact methods (e.g. e-mail) and traditional methods (e.g. telephone calls with an operator and traditional mail) on the Company's products/services;
- b) survey of the degree of customer satisfaction, market surveys and statistical analyses;
- c) use as a commercial reference, even for hypotheses not referable to public contracts.

### **4. Legal basis for processing personal data**

The legal basis for the processing of personal data for the purposes referred to in paragraph 3 is the contract to which you are a party in order to enable the execution and management of the Services.

The provision of your personal data and/or that of the recipient of the shipment for the aforementioned purpose is optional, however, failure to provide your personal data and/or that of the person to whom the shipment is addressed will make it impossible to perform and manage the Services.

The legal basis for the processing for the purposes referred to in paragraph 3.1 a) is your specific consent.

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The provision of your personal data for the aforementioned purpose is optional and failure to provide it will only result in the impossibility of sending you advertising and promotional messages and carrying out market research. On the other hand, the execution and management of the Services agreed upon in the contract remains unaffected.

The provision of your personal data for the aforementioned purposes is optional and failure to provide it will only result in the impossibility of 3.1b) sending you advertising and promotional messages and carrying out market research and/or 3.1c) of mentioning it as a reference. On the other hand, the execution and management of the Services agreed upon in the contract remains unaffected.

We also specify that where you have given consent to authorize the pursuit of the purposes, respectively, referred to in paragraph 3.1(a) 3.1(b) and 3.1(c), you will still remain free at any time to withdraw consent and/or to object to the processing of data for the aforementioned purposes, by sending without any formality a clear written communication to that effect to the addresses better specified in paragraph 10 "Contacts for the exercise of the rights of the data subject and for more information" below.

With regard in particular to the exercise of the right to object for the aforementioned purposes, we inform you that if you exercise it, it will concern all methods of contact, both electronic and automated and traditional, without prejudice to your right to exercise your right to object limited to only some contact channels. For example, at any time, by contacting the Data Controller at the addresses better specified in paragraph 9 "**Rights of the data subject - complaint to the supervisory authority**" below, you may object only to the sending of promotional communications carried out through automated methods (i.e. contact by e-mail, etc.) and therefore give your consent only to the receipt of communications by traditional methods (i.e. paper mail or contact telephone with operator).

Following receipt of this request for revocation and/or opposition, cdi SBI srl will promptly proceed with the removal and deletion of your personal data from the databases and inform, where possible, for the same purposes of cancellation, any third parties to whom the data have been communicated.

## **5. Methods of processing personal data**

Your personal data will be processed manually, electronically and electronically, as well as on paper.

## **6. Recipients of personal data**

The Data may be communicated to external parties operating as **data controllers**, by way of example, supervisory and control authorities and bodies and in general subjects, public or private, entitled to request the Data. The Data may be processed, on behalf of the Data Controller, by external parties designated as **data processors**, who carry out specific activities on behalf of the Data Controller, by way of example, accounting, tax and insurance obligations, mailing correspondence, management of collections and payments, etc.

### **6.1 Persons authorised to process**

The Data may be processed by employees of the company departments responsible for pursuing the purposes indicated above, who have been expressly authorised to process the data and who have received adequate operating instructions.

## **7. Transfer of personal data outside the EU**

Your personal data and those of other parties will not be transferred outside the European Union.

## **8. How long does personal data retention?**

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Contract duration is 10 years after the termination of the contract. In the case of judicial litigation, for the entire duration of the same, until the exhaustion of the terms of appeal actions.

For the treatments referred to in point 3.1, the storage period is 5 years.

After the expiry of the storage terms indicated above, the Data will be destroyed or made anonymous, compatibly with the technical procedures of deletion and backup.

**9. Rights of the data subject - complaint to the supervisory authority**

Pursuant to art. 15 – 21 of the GDPR, in relation to the Personal Data communicated, you have the right to exercise the following rights:

- a) access and request a copy;
- b) request rectification;
- c) request deletion;
- d) obtain the restriction of processing;
- e) object to the processing;
- f) receive them in a structured, commonly used and machine-readable format for the purpose of exercising the right to portability.

To exercise your rights and to withdraw your consent, as well as for more information regarding your Personal Data, you may contact the Data Protection Officer of SBI srl, who can be reached at the following e-mail address **dpo@havant.com**, specifying the content of your request in the subject line.

We remind you that it is your right to lodge a complaint with the Guarantor for the Protection of Personal Data, with registered office in Rome, Piazza Venezia n. 11 - 00187 Rome, Telephone switchboard: (+39) 06.696771, Fax: (+39) 06.69677.3785, E-mail: protocollo@gpdp.it.

\_\_\_\_\_, li \_\_\_\_\_

For acknowledgment

Name and Surname \_\_\_\_\_

Signature and Stamp

\_\_\_\_\_

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**10. Declaration of consent by the data subject**

I, the undersigned \_\_\_\_\_, having examined the Privacy Policy above, in the knowledge that my consent is purely optional, as well as revocable at any time, I consent as the Client's legal representative to the processing of my Personal Data by the Company, as data controller, for the purposes indicated in point 3.1:

- 3.1 a) - Sending commercial communications                     I AGREE  I DO NOT AGREE
- 3.2 b) - Satisfaction detection                                     I AGREE  I DO NOT AGREE
- 3.3 c) - Commercial references                                     I AGREE  I DO NOT AGREE

\_\_\_\_\_, li \_\_\_\_\_

Name and Surname \_\_\_\_\_

\_\_\_\_\_

Signature and Stamp

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