

## **Information notice pursuant to article 13 of Regulation (EU) 2016/679**

(information to be provided where personal data are collected from the data subject)

We would like to inform you that, based on Regulation (EU) 2016/679, also known as the “General Data Protection Regulation” (“GDPR”), on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, such information and data as you may provide, or as we may collect, within such services as delivered by **Comepi Srl** will be processed in accordance with the above provisions and with the confidentiality obligations that inspire our business.

‘Processing’ means any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, organisation, storage, consultation, elaboration, alteration, selection, extraction, comparison, use, interconnection, blockage, disclosure by transmission, dissemination, erasure or destruction of data, even if not recorded in a data base.

This information notice is aimed at making known – in full transparency – the purposes we could use your data for, how we will handle them, who they could be disclosed to, where they could be transferred (inside or outside the EU) and what rights you have.

### **WHO WILL PROCESS YOUR DATA?**

Your data will be processed by **Comepi Srl** as Data Controller.

In addition to **Comepi Srl**, we hereby inform you that there are some External Data Processors, which have been duly mapped, registered, contracted and appointed by **Comepi Srl** on the basis of the provisions contained in art. 28 of the GDPR. The list of External Data Processors is available at the headquarters of **Comepi Srl**.

### **WHY DO WE NEED YOUR DATA?**

**Comepi Srl** will use your data exclusively for the following purposes:

management of the contractual relationship and provision of the Services. Your Data will be processed for the following purposes: establishment, management and termination of the contractual and business relationship; fulfilment of accounting and tax obligations; fulfilment of legal obligations, anti-money laundering controls; audits for tax and accounting purposes; management of disputes; provision, support, updating and information regarding the Services being offered.

**Comepi Srl** will process your data:

- based on your consent;
- because it is necessary to fulfil such contractual obligations as referred to in point 1 above;
- because it is necessary to fulfil the legal obligations you are subject to (e.g. accounting, salary and social security obligations);
- because data processing is necessary to pursue a legitimate interest

Therefore, the provision of Personal Data is mandatory for purposes listed above.

Failure to provide the data will make it impossible to achieve the above purposes, and thus to execute the contractual relationship.

The extent and suitability of the data thus provided will be assessed from time to time, in order to determine the resulting decisions and avoid processing data exceeding the purposes being pursued.

**Comepi Srl** undertakes not to use your personal data for any purpose other than those described in this information notice, unless we inform you in advance, and, where necessary, obtain your consent.

#### **HOW WILL WE USE YOUR DATA?**

**Comepi Srl** aims to protect the Data of its customers, relying on the principles of fairness, lawfulness and transparency for the processing thereof. Therefore, we hereby inform you that your Personal Data will be processed by means of tools and procedures suitable to ensure maximum security and confidentiality, through archives and in paper form, with the aid of digital media, computers and telecommunications.

We would like to remind you that you have the authority to exercise the right of opposition, which, unless otherwise stated by you, will be referred to both traditional and automated communications.

#### **HOW LONG WILL WE KEEP YOUR DATA?**

Your personal data will be stored, starting from their receipt / update, for a period consistent with the purposes they are intended to (in principle 5 and 10 years depending on the document as prescribed by law for accounting documents and up to unsubscribing from the newsletter for other purposes) and respecting what is required by law in the first place.

#### **WILL WE SHARE YOUR DATA WITH ANY OTHER PARTIES?**

For such purposes as stated above (“*Why do we need your data?*”), your data may be disclosed to third parties to fulfil obligations deriving from the law, regulations, community regulations or for aspects concerning the management and execution of the contractual relationship.

For such purposes as stated in this information notice your data may also be transferred to duly selected Business Partners of ours operating in the country that lies within the competence of the applicant and providing such level of data security as deemed “adequate”, in order to offer the applicant a more efficient service.

The Data will also be processed by properly trained internal resources of **Comepi Srl** operating as staff authorized to process the Data.

The stored Data may only be accessed by public authorities in such cases and manners as provided by current laws, in the event of legal disputes.

Your personal data will not be subject to diffusion.

#### **WHAT ARE YOUR RIGHTS?**

At any time, you will have the right to ask for:

- access to your personal data;
- correction in case of inaccuracies thereof;
- erasure thereof;
- limitations on the processing thereof.

Furthermore, you will have:

- the right to deny the processing thereof, unless the data are processed to pursue a legitimate interest of **Comepi Srl**;
- the right to the portability thereof, i.e. to receive – in a structured format, of common use and readable by an automatic device – the personal data supplied by you.

We will handle your request with the utmost care to ensure your rights are actually exercised. Finally, you will have the right to lodge a complaint with the National Data Protection Authority. For further information about the rights of the data subject, please refer to Chapter III of the GDPR.

#### **CAN YOU WITHDRAW YOUR CONSENT ONCE GIVEN?**

Yes, you can revoke your consent at any time. However, such withdrawal will be without prejudice to the following:

- any previous lawful act of data processing based on the consent given before the revocation;
- further processing of the same data based on other legal entitlements (for example, contractual obligations or legal obligations to which **Comepi Srl** is subject).

The details identifying the Data Controller for the processing of data provided by you are as follows:

**Comepi Srl**, with its principal office in Robbiate(LC), Novarino street, 9/L – phone number +39 039.9903468 , which you can contact at any time to exercise such rights as provided in the GDPR and listed above in detail.

Data Controller

**Comepi Srl**

I, the undersigned, \_\_\_\_\_ pursuant to Article 7 of Regulation (EU) n. 2016/679 of the European Parliament and of the Council of 27th April 2016 I give my consent and authorize **Comepi Srl** to the processing of my common, former sensitive and judicial personal data.