

INTRODUCTION

With the EU Regulation 679/2016, laying down provisions for the protection of individuals with regard to the processing of personal data, CIE TELEMATICA S.r.l. based in Via della Giardina, 15 - 20900 Monza (hereafter referred to as "organization") as Data Holder, legally represented by Meregalli Luigi, is required to provide some information regarding the use of personal data. The organization has chosen to appoint a Data Protection Officer (DPO), who can be contacted at the following addresses: s.brumana@cietelematica.it - pec: cietelematica@pec.it – Tel. +39 335 8471716.

DATA SOURCE AND TYPE OF PROCESSED DATA



Personal data collected by the organization can be collected:

- directly at the interested party
- at public access sources (eg documents published at the chamber of commerce, etc.)
- from third parties in the hypothesis in which the organization acquires data in order to request offers of products and / or services

For data collected not directly from the interested party, this information is provided at the time of their registration and in any case not later than the first possible communication.

Data processed, where the current relationship requires it, are: personal data.

In any case, all these data are processed in compliance with the aforementioned law and the obligations of confidentiality which have always been inspired by the organization's activities.

DATA CONSERVATION PERIOD



Data are kept only for the period necessary for the purposes for which they are processed or within the terms provided for by national and Community laws, rules and regulations to which the organization must comply (eg accounting and tax regulations, etc.).

It is expected that a periodic check will be carried out annually on the data processed and on the possibility of being able to cancel them if no longer necessary for the intended purposes.

DATA CONFERMENT AND CONSEQUENCES OF FAILED CONFERMENT



The provision of data must be considered mandatory with regard to the processing that the organization must perform to fulfill its obligations towards the data subject on the basis of the relationship (or contract) in place, as well as legal obligations, rules, regulations. Failure to provide such data may make it impossible for the organization to proceed with the current relationship.



The approval is not mandatory for all other purposes and, when conferred, can be revoked at any time by the interested party.

MANDATORY/NOT MANDATORY

The purposes for which the provision of data is mandatory are marked with the following symbol:




The purposes for which it is NOT mandatory to provide data are marked with the following symbol:





PURPOSE OF DATA PROCESSING




Data are processed within the normal activity of the organization and for the following purposes. If the owner intends further processing of the personal data for a different purpose than that for which they were initially collected, it will provide to the interested party all necessary information and will proceed to request the approval where required.

 Acquisition of services and / or products in the context of the relationship (or contract) in place including the purposes related to the management of contracts and entry sites where applicable (eg communication of data to customers, sending documents with photographs of employees, etc.), management of administrative/accounting and tax obligations for public institutional purposes, implementation and management of obligations under national and community laws, regulations and legislation, as well as provisions issued by authorities legitimated by law and by supervisory and control bodies (for accounting, tax, workplace safety ...).

 Market surveys, marketing activities, sending material containing commercial information related to products / services / seminars / conferences already acquired or new proposals, in any way and by any means carried out, even with automated methods (eg by email, newsletter , fax, telephone, mail, social networks, etc.).

 Detection of the degree of satisfaction of the interested party about the quality of the products / services or activities of the organization, performed directly by means of questionnaires, etc.

 Quotation of the name and use of the customer's logo as reference, through communications made using paper material (eg supplier catalogs, etc.).

LEGAL BASIS OF DATA PROCESSING



Data are processed for the aforementioned purposes, as well as on the basis of the consent (purpose no. 2) also in order to comply with a contractual / pre-contractual, legal, regulatory obligation, as well as provisions issued by legitimate authorities and by supervisory/control bodies (purpose no. 1). The explicit regulatory references updated to their last revision status which provide for the obligations or obligations on the basis of which data processing may be carried out may be available and consulted at the Data Controller and in any case are part of the current law union as well as the Member State to which the data controller is subject.

DATA PROCESSING METHODS



The processing of personal data is done by manual, information technology tools with logic strictly related to the purposes themselves and in any case in order to guarantee the security and confidentiality of the data. The documentation is archived both electronically and on paper. Here are some essential information.



The collection of personal data is limited to the minimum necessary for each specific purpose of the processing.



The processing of personal data is limited to the purposes for which it was collected.



The storage of personal data is limited to the minimum necessary for each specific purpose of the processing.



Personal data are not provided to commercial third parties



Personal data are not sold or rented.

DISTRIBUTION AREA AND CATEGORIES OF SUBJECTS TO WHICH DATA CAN BE COMMUNICATED



Personal data collected by the organization may be communicated, within the limits strictly relevant to the aforementioned purposes, also to the following subjects or categories of subjects. For all the aforementioned purposes, the communication of data also derives from a legal, contractual obligation or is a necessary requirement for the conclusion of a contract. In the absence of these communications, the relationship / contract may not be completely fulfilled.

Data could also be communicated for the above explicit purposes also in non-EU third countries, in the hypothesis in which the interested party belongs to a non-EU country, to the following subjects. The organization will verify before the communication the adequacy of the third country, the existence of adequate guarantees or the possibility to make use of the expected exemptions.

- ✔ Subjects to whom the communication is required by law, by regulation or by national and community legislation as well as for the execution of contractual or pre-contractual obligations.
- ✔ Credit institutions, insurance companies, pension funds and similar institutions for the execution of contractual or pre-contractual obligations.
- ✔ Companies that carry out transmission, enveloping, transport and sorting of communications to the interested parties.
- ✔ Legal and accounting consultants for the purpose of studying and resolving any legal problems relating to the existing contractual position.
- ✔ Consultants and professionals (technicians, designers, etc.) or companies that collaborate with the organization in order to provide the requested service or sell the purchased product (eg express couriers etc.).
- ✔ Third party companies specialized in the management of accounting and tax aspects (eg accountant etc.).

RIGHTS OF THE INTERESTED PARTY



At any time the interested party may exercise his / her rights towards the Data Controller or Data Processor, pursuant to EU Regulation 679/2016, contacting Mr. Luigi Meregalli at CIE Telematica S.r.l. through the following addresses: w.master@cietelematica.it - Tel.: +39 03927119.1 - Fax: +39 039 27119.399 – Cie Telematica s.r.l. - Via della Giardina, 15 - 20900 Monza (for written communications).

The Data Protection Officer (DPO) can be contacted at the following addresses: s.brumana@cietelematica.it - pec: cietelematica@pec.it – Tel. +39 335 8471716.

To guarantee the correct exercise of the rights, the interested party must be identifiable in an unequivocal manner. The organization undertakes to provide feedback within 30 days and, if it is impossible to comply with these deadlines, to justify the possible extension of the deadlines. The response will be free of charge except in cases of groundlessness (eg there are no data concerning the applicant) or excessive requests (eg repetitive over time) for which a fee may be charged no higher than the costs actually incurred for the research carried out in the specific case. The rights related to personal data concerning deceased persons may be exercised by those who have an interest of their own or act to protect the data subject or for family reasons deserving protection. The data subject can also submit a complaint to the supervisory authority.

In case of violation of personal data suffered by the organization, the holder will proceed to notify the competent control authority within 72 hours of the occurrence and will also communicate the event to the interested party, except in cases of exclusion provided by the law.

THE INTERESTED PARTY HAS THE RIGHT TO REQUEST: access, rectification, deletion of personal data, limitation of processing, as well as data portability.

THE INTERESTED PARTY HAS THE RIGHT OF OPPOSITION: processing and revocation of the approval at any time without prejudice to the lawfulness of the treatment based on the express approval prior to the revocation.

RIGHT TO OBTAIN INDICATION OF

- Origin of personal data.
- Categories of data processed.
- Purposes and methods of treatment.
- Conservation period.
- Logic applied in case of treatment carried out with the aid of electronic instruments.
- Identification details of the Data Controller and the Data Processor.
- Subjects and categories of subjects to whom personal data may be communicated or who can learn about them as managers or persons in third countries.
- Existence of the profiling process.

RIGHT TO OBTAIN

- Confirmation of the existence or non existence of their personal data and that such data be made available in an intelligible form.
- Updating, rectification, data integration and limitation.
- Cancellation (right to be forgotten), transformation into anonymous form or blocking of data processed in violation of the law (including those for which storage is not necessary in relation to the purposes for which they were collected or subsequently processed).
- Certification that the operations referred to in the points above have been brought to the attention of those to whom the data have been communicated or disseminated, except in the case where this fulfillment proves impossible or involves a use of means manifestly disproportionate to the protected right organization.
- Data portability (direct transmission from one owner to another).
- Copy of the data being processed.

RIGHT OF OPPOSITION

- Processing of personal data concerning the data subject including profiling for legitimate reasons, even if pertinent to the purpose of the collection.
- Processing of personal data concerning the data subject for the purposes of: sending advertising material, direct sales, carrying out market research, commercial communications.
- Processing of data handled for scientific or historical research purposes or for statistical purposes, except in the case of public interest in processing.



INFORMATION AND REQUEST FOR APPROVAL TO THE PROCESSING OF PERSONAL DATA FOR CUSTOMERS





CIE TELEMATICA S.r.l. - Via della Giardina, 15 - 20900 Monza

Rev. 2018

COMPANY NAME/
NAME AND SURNAME

ADDRESS

Given that, as defined in the information that the supplier organization / the undersigned expressly declares to have received and read, the execution of the relationship / contract in place with CIE TELEMATICA S.r.l. it may entail the need to process data (even of natural persons linked to the supplier organization) and in the knowledge that, in the absence of the provision of such data (and in the absence of related communications) the relationship / contract may not be fully exercised, The supplying organization / undersigned freely expresses its consent in the manner indicated below.

	PURPOSES FOR WHICH APPROVAL IS REQUIRED	I AGREE	I DISAGREE
	Acquisition of services and / or products in the context of the relationship (or contract) in place including the purposes related to the management of contracts and entry sites where applicable (eg communication of data to customers, sending documents with photographs of employees, etc.), management administrative, accounting and tax obligations for public institutional purposes, implementation and management of obligations under national and community laws, regulations and legislation, as well as provisions issued by authorities legitimated by law and by supervisory and control bodies (for accounting, tax, workplace safety ...).	<input type="checkbox"/>	<input type="checkbox"/>
	Market surveys, marketing activities, sending material containing commercial information related to products / services / seminars / conferences already acquired or new proposals, in any way and by any means carried out, even with automated methods (eg by email, newsletter , fax, telephone, mail, social networks, etc.).	<input type="checkbox"/>	<input type="checkbox"/>
	Detection of the degree of satisfaction of the interested party about the quality of the products / services or activities of the organization, performed directly by means of questionnaires, etc.	<input type="checkbox"/>	<input type="checkbox"/>
	Quotation of the name, use of the logo and any advertising material of the company of the partner / supplier by way of reference, through communications made through textual material on catalogs and quotations to new potential customers or customers already acquired.	<input type="checkbox"/>	<input type="checkbox"/>

SIGNATURE

DATE