











**PRIVACY POLICY FOR SUPPLIERS- NATURAL PERSONS**





Information document pursuant to and in accordance with Article 13 of Regulation (EU) 2016/679 (GDPR)

	<b>WHY THIS INFORMATION?</b> <b>1.WHO IS THE DATA CONTROLLER? CONTACT INFORMATION</b> The Data Controller is <b>Fondital S.p.A.</b> , with registered office in Vobarno – BS, Via Cerreto, 40, 25079, in the person of its pro-tempore Legal Representative. The contact details of the Data Controller are: tel. +39 036587831 email <a href="mailto:privacy@fondital.it">privacy@fondital.it</a>
	<b>2.TYPE OF DATA PROCESSED</b> <b>Personal data:</b> any information relating to an identified or identifiable natural person (“ <b>data subject</b> ”); an identifiable person is someone who can be identified, directly or indirectly, by specifically referring to an identifier such as name, identification number, location data, online identifier or to one or more factors specific to his/her physical, physiological, genetic, mental, economic, cultural or social identity (C26, C27, C30). <b>The categories of data that will be processed for the purpose indicated below are specifically:</b> <b>i) personal and contact data: name, surname, tax code/VAT number, e-mail, telephone number and position held at the company to which the data subject belongs; ii) further personal data that may be collected during the negotiation and/or conclusion and/or termination of the contractual relationship, all for the fulfilment of the contract stipulated with the Technical Assistance Centre (hereinafter "CAT") regarding the offer of the customer service.</b>

**3. PURPOSES OF THE PROCESSING, LEGAL BASIS, DATA RETENTION PERIOD AND NATURE OF THE PROVISION**

 <b>PURPOSES OF THE PROCESSING</b>	 <b>LEGAL BASIS</b>	 <b>DATA RETENTION PERIOD</b>	 <b>NATURE OF THE PROVISION</b>
<b>A) Fulfilment of contractual obligations,</b> processing necessary for the execution of the contract stipulated with the CAT. Data will also be published on Fondital website (name, surname and telephone number) so that customers can contact their local CAT for assistance services.	The processing is necessary for the execution of a contract (C44) Art. 6 par. 1 letter b) GDPR  Fulfilment of legal obligations Art. 6 letter c) GDPR	10 years or as provided by other legal obligation	The provision of personal data is necessary in order to fulfil the contract (provision of customer service)  Failure to provide the necessary personal data makes it impossible to establish a contractual relationship with you
B) asserting and defending one's own rights, also within the scope of debt collection procedures against the data subject or a third party in a possible dispute	Legitimate Interest of the Data Controller when processing is carried out pursuant to Article 6, letter f of GDPR, fairly balanced with the legitimate interest of the Data Subjects, in that the Personal Data processing activity is limited to what is strictly necessary.	In case of litigation, personal data will be kept for the entire duration of the trial and until the judgement becomes final.	The provision of data is not compulsory and the data subject may object to the processing.

 <b>PURPOSES OF THE PROCESSING</b>	 <b>LEGAL BASIS</b>	 <b>DATA RETENTION PERIOD</b>	 <b>NATURE OF THE PROVISION</b>
<p>C) Providing you with information of a commercial nature on products or services of the data controller.</p>	<p>Legitimate interest of the Data Controller, Art. 6 letter f) GDPR</p> <p>You may at any time exercise your right to object to receiving these communications, either immediately or at a later date, by clicking on the unsubscribe button contained in the emails or newsletters.</p>	<p>Until opt-out   unsubscribing from the mailing list</p>	<p>The provision of data is optional: You have the right to object, at any time, to the processing of your data for this purpose.</p>

	<p><b>4. WHOM WILL PERSONAL DATA BE COMMUNICATED TO? RECIPIENTS OF DATA</b></p> <p>Data will be communicated to subjects who will process data in their capacity as Data Processors (Art. 28 GDPR) or as natural persons acting under the authority of the Data Controller and Data Processor (Art. 29 GDPR). In particular, data will be communicated to:</p> <ul style="list-style-type: none"> <li>- external subjects who manage / support / assist, even occasionally, the Data Controller in the management of the website;</li> <li>- Consultants /freelancers;</li> <li>- authorities for the fulfilment of legal obligations and/or provisions of public bodies.</li> </ul> <p>The list of data processors is available at the registered office of the Data Controller or by writing to <a href="mailto:privacy@fondital.it">privacy@fondital.it</a></p>
	<p><b>5. IS THERE A DATA TRANSFER TO A NON-EEA COUNTRY?</b></p> <p>Data will not be transferred to or communicated outside the European Economic Area. Should this be necessary, personal data will be transferred subject to appropriate information notice for the data subjects and within the limits and conditions set out in Articles 44 <i>et seq.</i> of EU Regulation 2016/679, in order to comply with purposes related to the transfer.</p>
	<p><b>6. IS THERE AN AUTOMATED PROCESS?</b></p> <p>We do not use decision-making processes based on automated processing, including profiling.</p>
	<p><b>7. THE RIGHTS OF THE DATA SUBJECTS</b></p> <p>You may assert your rights as expressed in Articles 15 <i>et seq.</i> of EU Regulation 2016/679 by contacting the Data Controller using the contact details indicated above. In particular, you have the right, at any time, to obtain access to your personal data from the Data Controller (Art.15) and request the Data Controller information relating to the processing, as well as to rectify (Art.16), erase (Art.17) your personal data or limit their processing (Art.18). The data controller shall communicate (Art. 19) to each of the recipients to whom the personal data have been transmitted any rectification or erasure or restriction of processing carried out. The data controller shall inform the data subject of such recipients if the data subject so requests. In the cases provided for, you have the right to the portability of your data (Art.20) and in this case you will receive them in a structured format, commonly used and readable by an automated device. You have the right to object to the processing of your personal data based on the legitimate interest. To stop receiving direct marketing communications, simply click on the "unsubscribe" button in any email or newsletter you receive or write an email to <a href="mailto:privacy@fondital.it">privacy@fondital.it</a>. If the processing of personal data by the Data Controller is believed to be in violation of the provisions of Regulation (EU) 2016/679, the data subject has the right to lodge a complaint with the Supervisory Authority, in particular in the Member State in which he/she usually resides or works or where the alleged infringement of the Regulation occurred (Italian Data Protection Authority <a href="https://www.garanteprivacy.it/">https://www.garanteprivacy.it/</a>) or to bring an action before the appropriate courts.</p>



#### **8. CHANGES TO THE POLICY**

The Data Controller may change, add or remove any part of this Privacy Policy, at any time. In order to facilitate the verification of any changes, the information notice will contain an indication of the date on which the privacy policy was updated.

Updated on: 29/11/2021