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INFORMATIVE LETTER CONCERNING THE TREATMENT OF PERSONAL DATA

ART. 13 EU REG. 2016/679 (for customers/suppliers)

Dear Customer /Supplier,

COMPASS S.R.L. informs you, according to art. 13 of the EU Regulation nr. 2016/679 ,that the personal data provided by you, as party interested to this process, will be processed in following manner and for the following purposes.

1. Data Controller.

The data controller is **COMPASS S.R.L.**, in the person of the legal representative, Mr. Daniele Querinuzzi, (Fiscal Code and V.A.T. Nr: 01458890934) based in San Quirino (PN), Via Dei Longobardi nr. 25, e-mail address: amministrazione@compass-it.com; PEC address: compass.srl@legalmail.it (hereafter also “Controller”).

2. Type of personal data processed.

The personal data processed are the identification data and the contact information that you provide (telephone number, e-mail address), as the data of subjects acting in your name and on your behalf in the context of existing contractual relationships with the Data Controller.

3. Purposes of data processing.

The personal data provided by you are collected and processed for the following purposes:

- a) The stipulation of contracts, including the pre-contractual phase and operations strictly connected and instrumental to the beginning of contractual relationships, including the preparation and sending of offers, and the fulfilment of contractual obligations;
- b) Fulfilment of legal obligations, including the obligations of fiscal, administrative nature and regarding the protection of personal data.

The data processing is based on principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

4. Legal basis for data processing.

According to Art. 6 of the EU Regulation 2016/679, the data processing is necessary for the a.m. purposes:

- in order to perform a contract of which the data subject is a party or in order to carry out pre-contractual measures adopted at the request of the same party;
- to fulfil the legal obligations to which the Data Controller is subject.

5. Methods of data processing.

The processing of personal data is made through any operation, set of operations, indicated in Art. 4 nr. 2) of the EU Regulation 2016/679 “*definition of data processing*” such as: collection, registration, organisation, retention, consultation, processing, modification, selection, extraction, comparison, use, interconnection, limitation, communication, cancellation and destruction of data. The data may be processed both on paper and by computer (including portable devices) and processed in a manner strictly necessary to meet the aforementioned purposes.

6. Refusal to provide data.

The provision of data is mandatory for the fulfilment of contractual and legal obligations indicated in the purposes listed above in point 3). Failure to communicate personal data, or incorrect communication of one of the mandatory information, can cause the controller to be unable to fulfil contractual and legal obligations.

7. Data communication.

The data controller may communicate the personal data that you provided to:

- employees and collaborators in their capacity as persons in charge and / or data processors;
- professionals, collaborators, consulting firms, credit institutions, insurance companies and third parties who carry out outsourced activities on behalf of the data controller or who provide services in his favour, in their capacity as independent external owners or data processors appointed by the data controller;
- Public authorities and other subjects who can access the data by virtue of legal provisions.

8. Data dissemination.

Personal data are not subject to dissemination, nor to any automatic decision process, including the profiling.

9. Transfer of data abroad.

Personal data are stored on servers located within the European Union, by the Data Controller or by third-party companies appointed and duly appointed as data processors. They can be transferred to countries of the European Union and to third countries with respect to the European Union only for the purposes referred to in point 3) in accordance with the provisions of EU Regulation 679/2016.

10. Data retention time.

The data are kept for a period necessary to carry out the activities required for the purposes referred to in point 3). In any case, such term will not exceed 10 years from the termination of the contractual relationship (considering a technical term of 30 days following the expiry of the term indicated, to proceed correctly with the deletion of data), in fulfilment of legal obligations. This, without prejudice to any delayed payments of the fees that justify the extension for the legitimate protection of the credit rights of the data controller and, in any case, for the protection, in judicial and / or administrative court, of his rights.

11. Rights of the interested party.

The interested party, physical person, to whom the data refer, has the right to exercise the rights indicated below:

- a) right of access, rectification, cancellation, limitation and opposition to data processing;
- b) right to obtain from the data controller, without hindrance, the data in a structured format of common use and readable by an automatic device, in order to submit them to another data controller, if technically feasible;
- c) right to withdraw the processing consent, without prejudice to the lawfulness of the processing based on the consent acquired before the revocation;
- d) right to lodge a complaint with the Supervisory Authority (Warrantor for Personal Data Protection – www.garanteprivacy.it).

12. Procedure for exercising your rights.

The aforementioned rights may be exercised by written communication to be sent by registered letter with return receipt to: **COMPASS S.R.L. based in San Quirino (PN), Via Dei Longobardi nr. 25, or by e-mail: amministrazione@compass-it.com, or to the PEC address: compass.srl@legalmail.it.**

San Quirino, 11/11/2020

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