



## **PERSONAL DATA PROCESSING POLICY**

### **D. Lgs. 196/2003 and Reg. 2016/679**

Ambro-Sol S.r.l., with headquarters in Via per Pavone del Mella, 21 - 25020 Cigole (BS) CF and P.IVA 03114470176, in its capacity as the Controller hereby informs you that, as required by D. Lgs. 196/2003 (Privacy Code) and by the Reg. EU 2016/679 (GDPR) about the protection of persons, personal data (personal and fiscal ones) you provided us according to the business relationship that binds our companies will be treated as these regulations require and for the following purposes:

#### **1) OBJECT OF PROCESSING**

Ambro-Sol S.r.l. treats personal data (for example: name, company name, address, telephone number, e-mail, financing and payment references) you provided us according to the business relationship that binds our companies.

#### **2) PURPOSE OF PROCESSING**

Personal data you provided us in your capacity as the data subject interested in the processing<sup>1</sup> will be used for the following purposes:

- administrative/ financial/accounting/ activities;
- to fulfill the obligations of a contract, contractual and tax issues arising from our relationship;
- to perform daily work relation, allowing the managing of business activities (logistic and organizational ones);
- to give information and assistance, suggestions and/or replies to specific needs you may signal us.

For the following marketing purposes:

- to send newsletters, publicity or informative materials, commercial and interactive communication.

#### **3) METHODS OF PROCESSING**

The processing is carried out by means of operations or series of operations listed in Art. 4 of the GDPR: collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. The processing is carried out by paper and computer. Ambro-Sol S.r.l. guarantees that data will be processed for the period of time strictly necessary for fulfilling the purposes for which the data were collected and for no more than 10 years from the cessation of the trading relationship.

#### **4) DATA ACCESS**

The data can be accessed for previous purposes:

- by employees and collaborators of Ambro-Sol S.r.l., internal managers and system administrators.

#### **5) DATA COMMUNICATION**

In relation to the above described purposes, your personal data could be communicated to the following categories of subjects:

- third party companies or other subjects (ex. insurance companies, certification bodies, recovery of uncontested debts companies, professionals, providers, internet/web agencies etc.);
- public subjects to which the data are to be provided by law (ex. provident societies, government agencies etc.);

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<sup>1</sup> 'Consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

- judicial authorities.

These subjects will be treated in their capacity as data Controllers.

## 6) DATA TRANSFER

Your personal data are stored on dedicated servers and have been protected by appropriate preventive safety measures.

Ambro-Sol S.r.l. processes data into the European Union in its capacity as the main establishment and does not transfer your data to other establishments.

Ambro-Sol S.r.l. does not transfer your data to third countries.

## 7) RIGHTS OF THE DATA SUBJECT

Pursuant to art. 15 of the GDPR at any time you may exercise your right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

## 8) EXERCISE OF THE RIGHTS

Such rights may be exercised by sending a written request to the e-mail address [dpo@ambro-sol.com](mailto:dpo@ambro-sol.com) or by post to the headquarters.

## 9) DATA CONTROLLER AND PROCESSOR

The data Controller is Ambro-Sol S.r.l. with headquarters in Via per Pavone del Mella, 21 - 25020 Cigole (BS) in its capacity as its CEO Mirco Ambrosini.

No Processors<sup>2</sup> have been appointed (art. 28).

No Protection Officers<sup>3</sup> have been appointed (art. 37).

Mirco Ambrosini – Legale Rappresentante



<sup>2</sup> 'Processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller.

<sup>3</sup> DPO.