



# BELTION

INFORMATION TO CUSTOMERS PURSUANT TO ART. 13 OF THE EU REGULATION 2016/679

## Dear Customers,

in compliance with the provisions of art. 13 of the EU Regulation 2016/679 (hereinafter the "Regulation"), we provide you the following information on the processing of your personal data (hereinafter "Data").

### DATA CONTROLLER AND CONTACT DETAILS

The customers' data controller is BELTION SRL, Via Cavalieri del Lavoro z.i., 70017 - Putignano (Ba), (hereinafter "The Company"). It is responsible for processing of the personal data related to Customers. For communications or requests, the Company can be reached by e-mail at [regolatorio@beltion.it](mailto:regolatorio@beltion.it)

### CATEGORIES AND TYPES OF DATA COLLECTED AND PROCESSED

The data processed by the Company may include common data collected to close deals with customers and/or deals implementation and/or the deals signing.

### PURPOSE OF THE TREATMENT AND LEGAL BASIS

Personal data will be collected, stored and processed by the Company, in compliance with current legislation on the protection of personal data and even without the consent of the people concerned, for the following purposes:

- fulfilment of contractual obligations, implementation and/or conclusion of contracts with Customers and/or management of any pre-contractual measures;
- compliance with any legal obligations, tax and fiscal regulation related to the Company's activities and obligations due to administrative and accounting activities;
- direct sending of their own advertising material or direct sale or market research or commercial communications in relation to products or services similar to those used by customers;

The legal bases of the processing for the above-mentioned purposes a); b) and c) are those provided by:

**Art.6 co1 lett.b of the Regulation** the treatment is necessary for the implementation of contracts and/or pre-contractual actions.

**Art.6.co1 lett.c of the Regulation** the treatment is necessary to comply with a legal obligation involving the data controller.

**Art.6.co1 lett.f of the Regulation** the treatment is necessary to pursue the legitimate interest of the data controller.

The provision of data for these purposes is optional, but not providing the data and refusing to provide them would make it impossible for the Company to perform and/or conclude contracts and satisfy the supplies requested.

In the end, please note that for the processing referred to in letter c), the Company may use e-mail addresses in accordance with and within the limits allowed by art.130, paragraph 4 of the Privacy Code (Legislative Decree no. 196/2003) and the provision of the Guarantor Authority for the protection of personal data of 19 June 2008 even without the expressed permission. The legal basis for the processing of data for this purpose is art. 6, paragraph 1, letter f) of the Regulation, notwithstanding the possibility of objecting of such processing at any time, following the indications in the section "Rights of the Data Subject" of this Policy.

### METHODS OF DATA PROCESSING

The data will be processed using manual, IT and telematic tools with procedures strictly related to the aforementioned purposes and, in any case, with methods that guarantee the security and confidentiality of the data, in addition to compliance with the specific obligations established by law. The Data will be processed in compliance with the principle of lawfulness, correctness, relevance and non-excess, in accordance with the provisions of the legislation on the protection of personal data.

The processing will be carried out by formally appointed and properly trained personnel.

### SCOPE OF COMMUNICATION AND DISSEMINATION OF DATA, RECIPIENTS AND TRANSFER OF DATA AND DATA CONTROLLERS

To pursue the aforementioned purposes, the Data may be disclosed to third parties appointed as data processors pursuant to Article 28 of the Regulation and in particular to banks, insurance companies, service providers strictly necessary to carry out the business, or consultants of the company, where this is necessary for tax, administrative, contractual or for needs protected by current regulations.

Finally, the Data may be shared with authorities, institutions and/or subjects to whom the Data must be communicated under the provisions of law or orders of authority. These authorities, institutions and/or subjects will operate in total autonomy as separate data controllers. The Data will not be disclosed. The periodically updated and complete list of the people appointed to process the Data may be requested by sending an email to the Data Controller at the aforementioned addresses.

### DATA TRANSFER TO INTERNATIONAL ORGANIZATIONS AND/OR NON-EEA COUNTRIES

Any transfer of Data to international organizations and/or countries outside the EEA will be done in one of the ways permitted by current legislation, such as consent of the people involved, the adoption of Standard Clauses approved by the European Commission, the selection of parties participating in international programs for free data movement (e.g. EU-US Privacy Shield) or operating in countries considered safe by the European Commission. Upon request, it is possible to obtain more information from the DPO and/or the Company on the aforementioned contacts.

### DATA RETENTION

The Data will be stored on paper and/or computer archives for the time necessary for the purposes for which they were collected only, respecting the basics of conservation limitation and minimization as per Article 5, paragraph 1, letters c) and e) of the Regulation.

The Data will be kept in order to comply with regulatory obligations and to pursue the aforementioned purposes, in compliance with the principles of indispensability, non-surplus and pertinence. The Company may retain Data after the termination of the business relationship in order to comply with legal and/or post-contractual obligations; afterwards, once the aforesaid reasons for processing no longer apply, the Data will be deleted, destroyed or simply stored anonymously.

Upon request, it is possible to obtain more information from the DPO and/or the Company on the aforementioned contacts.

### CUSTOMERS' RIGHTS

In relation to the aforesaid processing, each customer may exercise the rights according to Articles 15 to 22 of the Regulations. In particular, the people involved have the right to ask the Company for access to their data, for its rectification or for its cancellation, to object to the processing or to request the limitation of the processing in the cases provided for by article 18 of the Regulation and to obtain their data in a structured format, commonly used and readable by an automatic device, in the cases provided for by article 20 of the Regulation. The interested people may also revoke at any time the consent given pursuant to Article 7 of the Regulation, and lodge a complaint with the Data Protection Authority pursuant to Article 77 of the Regulation, if he believes that the processing of his data is contrary to the law in force. In cases of opposition to the processing of Data pursuant to Article 21 of the Regulations, the Company reserves the right to evaluate the application, which will not be accepted if there are legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the interested party. Written Requests should be addressed to the DPO or the Company at the above addresses.

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