

CUSTOMER POLICY

Object: Policy according to the articles 13 and 14 of the European Regulation 2016/679 (GDPR, GENERAL DATA PROTECTION REGULATION, about the protection of personal data of natural persons).

According to art. 13 GDPR, containing provisions about protection of personal data, we inform you that your personal data will be processed in compliance with GDPR and duty of confidentiality of Eurotrol S.p.A.

1. **Definition of data processing:** personal data processing means any operation, performed with or without the use of automated processes and concerning personal data, even if not recorded in a database, such as collection, registration, organization, storage, selection, blocking, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion, comparison or interconnection, limitation, cancellation or destruction.

2. **Purpose of data processing:** according to the art. 13 of the GDPR personal data (name, last name, identification and copy of documents, phone number, e-mail address, electronic forms etc.) will be provided at the conclusion of the contract.

Personal data

Personal data will be processed:

- a) related to **contractual obligations** :
 - a.1 in order to fulfill the contract;
 - a.2 in order to collect payments;
- b) related to law:
 - b.1 in order to be compliance with law, regulation, community legislation, including administrative and accounting regulation, as well as with provisions of Authorities and Supervisory Board;
 - b.2 in order to fulfill tax and fiscal obligations;

3. We inform you that, considering the purpose of data processing, **you have to provide you personal data**. Otherwise, the contract will be not fulfill correctly.

4. **Data retention:** personal data will be stored for all the period of the contract and also in the case of revocation or termination of the contract, for the time required by law, that is ten years for accounting and tax data.

5. **Data Controller** is Eurotrol S.p.A., in the person of legal representative.

6. **Data Processor** is Msr Patrizia Leoni.

7. **Subject authorized to the processing data:** personal data will not be disclosed and will not be communicated without the explicit consent of the interested subject, except for the necessary communications that may involve the transfer of data to public bodies, consultants or other subjects for the fulfillment of legal obligations or for follow the purpose of data processing.

8. **Data processing methods:** Personal data will be processed in an automated and / or manual form, in compliance with articles 28, 29 and 32 of GDPR.

We inform you that, according to art. 5 GDPR, with your free and express consent in the bottom of this privacy policy, your personal data will be stored for the time necessary to follow the purpose of processing.

9. **Personal data transfer:** Your data will not be transferred either to EU members or to other third countries, unless the transfer is necessary for the nature of the job or the subject matter.

10. Data Categories: personal data include:

- identification and personal data (name, surname, identity document and passport number, nationality, place and date of birth, gender, photos, all computer data that are automatically transferred for the functioning of the systems, knowingly and unknowingly)
- contact data (address, mailing address);
- fiscal data (es. tax code, VAT number);
- education and employment data (level of education, employment, name of employer, remuneration);
- banking, financial and transaction data (bank account details, credit card number, transfers of funds, assets, declared investor profile, credit history).

11. Particular categories of personal data: according to the articles 9 and 10 European Regulation 2016/679, you could provide particular personal data, data that can show “Racial or ethnic origin, political opinions, religious or philosophical beliefs, or union membership, as well as genetic data, biometric data, data related to health or sex life or 'sexual orientation of the person’”. These categories of data may be processed by the Data Controller only upon your free and explicit consent, expressed in writing at the bottom of this information.

12. Right of opposition

In ogni momento, Lei potrà esercitare, ai sensi dell’art. 21 Regolamento UE n. 679/2016, il diritto di:

At any time, according to the art. 21 GDPR, you can exercise the right of opposition:

- a) to the data processing anytime and in the case of data processing for direct marketing;
- b) to automated decision process about natural persons, such as profiling.

13. Right of data subject

At any time, according to the articles 15-22 of European Regulation 2016/679, you can:

- a) request confirmation of the existence or not of personal data;
- b) have information on the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be communicated and, if it is possible, the data retention;
- c) data correction and deletion of personal data;
- d) obtain data processing limitation;
- e) obtain data portability. You can receive your personal data from the data controller, in a structured format, commonly used and readable by automatic device and transmit them to another data controller without impediments
- f) ask the data controller to access personal data, correct or delete them, limit their processing;
- g) withdraw the consent at any time without prejudice to the lawfulness of data processing based on the consent given prior to the revocation;
- h) propose a complaint to the supervisory authority.

14. The lack of consent: if you are part of a contract, the lack of consent to the data processing necessary in order to fulfill the contract, prevent its execution and the compliance with legal obligations (for example accounting and tax obligations).

You can exercise your right by sending a request to the following address: eurotrol@eurotrol.it.

Settimo Milanese, on _____

CONSENT TO THE DATA PROCESSING

I _____, according to the European Regulations 2016/679, declare to have read this policy, and I consent to the data processing in order to follow the indicated purposes.

For more purposes:

☐ **consent** ☐ **DO NOT consent** to personal data processing, including particular categories of data.

☐ **consent** ☐ **DO NOT consent** to the communication of my personal data to public bodies, professionals and private companies for the purposes indicated in the information.

☐ **consent** ☐ **DO NOT consent** to the sending of commercial communications, about the price lists of our company's products, by the data controller.

☐ **consent** ☐ **DO NOT consent** to the sending of marketing communication by the data controller.

Settimo Milanese, on _____

Signature _____