

INFORMATION ON THE PROCESSING OF PERSONAL DATA

made pursuant to art. 13 of Regulation (EU) 2016/679
General Data Protection Regulation

CUSTOMER INFORMATION

Who is the Data Controller?	Maltempi S.r.l. , with registered office in Via Malignani 1/A Fontanafredda (PN). You may contact the Controller at the following email address: privacy@maltempisrl.com : privacy@maltempisrl.com .
How can I contact the DPO?	The appointed DPO (Data Protection Officer) can be reached at: dpo@maltempisrl.com
What personal data do we process?	<ul style="list-style-type: none"> • Personal details (name, surname, place and date of birth, Tax Code); • Residential address; • Personal contact details (email and phone number); • Personal data related to invoicing and payment methods; • Personal image.
Why do we process Personal Data? (Purposes)	<ol style="list-style-type: none"> 1. Establishment and management of relationships with Customers, including Customer Care and all related administrative-accounting purposes. 2. Establishment, exercise, or defense of the Controller's rights, including in judicial settings . 3. Marketing and profiling activities, by sending commercial communications, promotions, and discounts. 4. Video surveillance activities (where systems are present) carried out for security, protection, and safeguarding of corporate assets.
What is the Legal Basis for Processing? (Legal Basis)	<ol style="list-style-type: none"> a. The processing referred to in point 1) is necessary for the implementation of pre-contractual measures taken at the request of the data subject or for the performance of a contract to which the data subject is party. b. The same processing referred to in point 1) is necessary for the fulfillment of a legal obligation to which the Data Controller is subject, with regard to accounting matters. c. The processing referred to in points 2) and 4) is related to the legitimate interest of the Data Controller. d. The processing referred to in point 3) is based on the free, specific, and informed consent of the data subject.
How do we process personal data?	Electronically, observing every precautionary measure applied by the Controller to guarantee security, confidentiality, and control. Data may also be stored and processed on servers located outside the European Community in compliance with current regulations.
To whom do we communicate personal data? (Recipient Categories)	<ol style="list-style-type: none"> a. Employees, collaborators, and persons appointed and authorized by the Data Controller; b. Service providers acting as Data Processors pursuant to Article 28 of the GDPR, such as, for example, the company management software provider; c. Entities legally entitled to access the data; d. Parties to whom communication is necessary for the fulfillment of contractual obligations; e. Public authorities; f. Third parties. <p>The personal data processed by the Data Controller are not subject to disclosure in any way.</p>

<p>How long do we retain personal data?</p>	<p>Personal data will be retained for the time necessary to achieve the purposes listed above. Specifically, the data will be processed by the Data Controller:</p> <ul style="list-style-type: none"> - For a period no longer than 10 years from the termination of the relationship between the Data Controller and the data subject, without prejudice to the interruption of the statute of limitations; - For marketing activities, for a period no longer than 24 months from the data subject's consent, unless revoked; - For profiling activities, for a period no longer than 12 months from the data subject's consent, unless revoked. - For video surveillance activities, for a period between 24 hours from the time the footage is acquired and a maximum of 72 hours if the conditions are met. <p>Criteria used to determine the further data retention period:</p> <ul style="list-style-type: none"> a. Pursuit of the purposes related to the processing; b. Retention period required by law; c. Withdrawal of consent by the data subject (in the case of consent-based processing); d. Maximum period permitted by applicable law to protect the Data Controller's rights and/or interests.
<p>Is providing personal data mandatory or optional? What happens if I refuse to provide personal data?</p>	<p>For data processing carried out on the basis of the contractual relationship, the provision of data is mandatory, and refusal to provide it may make it impossible to conclude the contract and thus unable to provide the requested service.</p> <p>For data processing carried out based on the data subject's consent, the provision of data is optional, and refusal to provide it would only make it impossible for the Data Controller to provide additional information on its products and services. Any other existing relationships between the data subject and the Data Controller would not be affected by the failure to provide consent.</p>
<p>What rights does the interested party have?</p>	<p>The interested party has the right to:</p> <ul style="list-style-type: none"> a. Access the data we hold and request communication there of in an intelligible form; b. Request updating, rectification, and/or integration; c. Request erasure ("right to be forgotten"); d. Request limitation of processing; e. Request notification of the update, rectification, cancellation, limitation; f. Request data portability; g. Object to processing; h. Withdraw consent; i. File a complaint with a supervisory authority.

1 - 1 - Identity and contact details of the Data Controller

Maltempi S.r.l., with registered office at Via Malignani 1/A, Fontanafredda (PN). The Data Controller can be contacted at the following email address: privacy@maltempisrl.com.

1bis - Contact details of the DPO

The appointed DPO can be contacted at dpo@maltempisrl.com

2 - Types of Data Processed

The Data Controller collects and processes data of data subjects for the purposes specified in point 3 below. Below is an illustrative list of the data processed:

- (i) personal data, such as name, surname, date and place of birth, tax code;
- (ii) contact details, such as residential address, email address, and telephone numbers;
- (iii) billing and payment information, such as credit card payment information;

personal images if the data subject voluntarily participates in information and promotional campaigns.

3 - Purpose and legal basis of data processing

The data will be processed, in compliance with the aforementioned legislation, for the following purposes:

- 1) For the proper management of customer relations and the provision of customer support, and therefore for the **proper management of the contractual relationship** between the data subject and the Data Controller to ensure access to the services offered.
The purposes described above all relate to the legal basis of the implementation of **pre-contractual measures** adopted at the data subject's request or the **execution of a contract to which the data subject is a party**, as well as the **fulfillment of a legal obligation** of the Data Controller, such as, for example, administrative and accounting requirements.
- 2) **Ascertainment, exercise, or defense, including in court**, of the Data Controller's rights (e.g., for the purposes of debt collection or protection, protection of company assets, dispute management); this processing purpose is based on the **Data Controller's legitimate interest**.

- 3) To carry out marketing and profiling activities, based on the specific, free, and informed **consent** to the processing given by the interested party.
- 4) To carry out surveillance activities for the purposes of safety, security, and protection of the integrity of company assets pursuant to Article 4 of the Workers' Statute; in this regard, it is specified that the Company has obtained authorization to install and operate the system from the competent DTL. This activity is based on the legitimate interest of the Data Controller.

4 - Data processing methods

Data will be processed using computerized or electronic means, in compliance with the Regulation and the Code, and, in any case, in a manner that guarantees the security and confidentiality of the data and prevents unauthorized disclosure or use, alteration, or destruction through efficient physical, logical, and organizational security measures.

The Data Controller will perform the processing using a personalized and non-automated evaluation process; the use of management software is intended solely to support human activity and does not replace it.

Where necessary for the pursuit of the purposes set out in paragraph 3, the Data Subject's Data may be transferred abroad, to non-EU countries/organizations that guarantee compliance with the processing methods established by the GDPR.

5 - Data recipients

The Data may be disclosed (limited to their respective areas of competence):

a) parties to whom communication of the data is necessary for the operation and provision of services and contractual or pre-contractual performance, who act as Data Processors pursuant to written agreements entered into with the Data Controller, such as, for example, the management software provider.

A list of all Data Processors may be requested by sending a communication to the addresses indicated in point 1.

b) persons in charge and authorized by the Data Controller who have undertaken confidentiality obligations or are subject to an appropriate legal obligation of confidentiality (e.g., employees and collaborators of the Data Controller);

c) in order to comply with legal, regulatory, EU legislation, or contractual obligations, as well as to exercise any rights in court, the following third parties may have access to the data subject's data:

- 1) banks, credit institutions, and financial institutions;
- 2) tax, legal, or accounting consultants;
- 3) companies that provide the Data Controller with services instrumental to debt collection;
- 4) companies that provide the Data Controller with services instrumental to the management of the contractual relationship (e.g., management application providers);
- 5) public and private supervisory and control authorities and bodies (e.g., the Revenue Agency, judicial authorities, etc.).

The data will not be disclosed.

6 - Data retention period

Within the scope of the purposes indicated above, the data will be retained for the time strictly necessary to achieve the purposes for which they were collected and processed. The criterion for determining the actual data retention period will be the statute of limitations for claims arising from the existing relationship with the Data Subject.

Without prejudice to the need to retain the data for the purposes of fulfilling the Data Controller's legal obligations or for ascertaining, exercising, or defending the Data Controller's rights in court, the data subject's data will not be retained for a period exceeding:

- 10 years from the termination of the relationship between the Data Controller and the data subject, unless the statute of limitations is specifically interrupted;
- 24 months from obtaining the data subject's consent for marketing activities, unless the data subject withdraws consent;
- 12 months from obtaining the data subject's consent for profiling activities, unless the data subject withdraws consent;
- From 24 hours from the moment the footage is acquired, to a maximum of 72 hours, if the conditions are met, for video surveillance activities.

Afterwards, the same data will be destroyed or irreversibly anonymized, unless their further retention is necessary to fulfill legal obligations or to comply with orders issued by Public Authorities and/or Supervisory Bodies.

7. Mandatory and optional nature of providing personal data

Per le prestazioni contrattuali svolte direttamente dal Titolare nei confronti dell'interessato, il conferimento dei dati ha natura obbligatoria; l'assenza del conferimento comporta l'impossibilità di procedere con la prestazione richiesta. Per le attività di marketing e profilazione, invece, si ricorda che la comunicazione dei dati non è obbligatoria, e il mancato conferimento non incide in alcun modo nella gestione dei rapporti contrattuali con il Cliente.

8 - Rights of the interested party

By sending a communication to the registered office of the Data Controller or to the address privacy@maltempisrl.com each data subject may at any time exercise the rights referred to in Articles 15 et seq. of the Regulation, including: (i) obtaining confirmation as to whether or not Data concerning him or her is being processed; (ii) obtain access to their Data and the information indicated in Article 15 of the Regulation; (iii) obtain the rectification of inaccurate Data concerning him without undue delay or the integration of incomplete Data; (iv) request the erasure of Data concerning him/her without undue delay; (v) request the restriction of the processing of Data concerning him/her; (vi) be informed of any rectification or erasure or restriction of processing made in relation to the data concerning him/her; (vii) receive the Data concerning him/her in a structured, commonly used and machine-readable format; (viii) object at any time, for reasons related to their particular situation, to the processing of data concerning them carried out on the basis of the legitimate interest of the Data Controller; (ix) object at any time, free of charge, to the processing related to the forwarding of promotional communications by email; The complete list of the rights of the Data Subject can be found on <https://www.garanteprivacy.it/Regolamento/dei-diritti-degli-interessati>.

The exercise of the above-mentioned rights is not subject to any formal constraint and is free of charge. A response to the request of the interested party is provided within one month of receipt of the same. In the event of particular complexity, the deadline may be extended; in these cases, the Data Controller undertakes to provide at least one interlocutory communication within one month of receipt of the request.

In the event of exercising one of the rights provided for by the Regulation, the Data Controller reserves the right to verify the identity of the requesting data subject, requesting to send a photocopy of an identity document certifying the legitimacy of the request. Once the identity of the applicant has been confirmed, the photocopy received will be immediately destroyed.

9 - Complaint to the Supervisory Authority

If the Data Subject believes that the Processing concerning him or her violates the provisions of the Regulation, he or she may always lodge a complaint with the Data Protection Authority (www.garanteprivacy.it), or with the Data Protection Authority of the country in which he or she habitually resides, works or the place where the alleged violation occurred.

Having read this policy, the undersigned, by signing it,

- ☐ agrees
☐ does not consent

to the processing of your personal data for direct marketing purposes, aimed at learning about services, promotions and commercial activities offered by the Data Controller.

You declare that you are aware that you can revoke the consent previously given at any time, free of charge, without prejudice to the fact that the withdrawal of consent does not affect the lawfulness of the processing carried out before the revocation.

Having read this policy, the undersigned, by signing it,

- ☐ agrees
☐ does not consent

to the processing of personal data for profiling purposes, aimed at learning about services, promotions and commercial activities tailored to the Data Controller.

You declare that you are aware that you can revoke the consent previously given at any time, free of charge, without prejudice to the fact that the withdrawal of consent does not affect the lawfulness of the processing carried out before the revocation.