

Information pursuant to Article 13 of the GDPR EU 2016/679 concerning the protection of personal data processing

Pursuant to and in accordance with Articles 13 and 14 of the European Regulation 2016/679 (hereinafter referred to as GDPR) concerning the protection of personal data, the individual firm **FABIO BENELLI**, in its capacity as Data Controller, hereby informs you that the data concerning you, provided by you or otherwise acquired, will be processed in compliance with the aforementioned legislation. The processing of personal data will be carried out in a lawful, correct and transparent way towards the person concerned.

Processing of personal data shall mean any operation or set of operations, carried out with or without the help of electronic means, concerning the collection, recording, organisation, keeping, interrogation, elaboration, modification, selection, retrieval, comparison, utilization, interconnection, blocking, communication, dissemination, erasure and destruction of data, whether the latter are contained or not in a data bank.

- DATA CONTROLLER

The Data Controller is the individual firm FABIO BENELLI, based in Genoa, Via Oliveto1/8, f.c.: BNLFBA90R28E253P, p.iva: 02896700354, PEC: fabiobenelli@pec.it, email: info@fabiobenelli.com

- CATEGORIES OF DATA PROCESSED

The data covered by this processing are as follows:

- in the case of a natural person: personal identification data, such as first name, surname, place and date of birth, c.f., identification document, tel. no., e-mail address, iban;
- in the case of a legal entity: company name and owner/referent of the company, e-mail address, iban, first name, surname, place and date of birth, f.f. of any referents and/or legal representatives of the company.

- PURPOSE OF PROCESSING

a) Your data will be processed for the following purposes:

- **to fulfil any pre-contractual, contractual and tax obligations** arising from relations with you; in particular: to enter into and execute the contract; to provide after-sales assistance; to draw up other accounting and/or tax documents relating to the activities carried out by the undersigned sole proprietor; to fulfil any other tasks entrusted to the undersigned sole proprietor by law;
- **to fulfil legal obligations or obligations** arising from regulations, Community legislation or an order of the Authority, including any communication necessary to fulfil legal obligations;
- exercise the rights of the Controller, e.g. right of defence in court;

b) (Customers only) Personal data may only be processed with your specific and separate consent for the following activities: Sending you by e-mail, post, sms, telephone contact, newsletter, commercial

communications and/or advertising material on products or services offered by the Owner and for the detection of the degree of satisfaction on the quality of services, promotional and marketing activities.

c) (Only for customers) Personal data may be processed for the following additional purposes, based on legitimate interest: Promotion by email of services, facilities and similar (so-called soft spam): communications of a 'direct marketing' nature to inform of promotions, facilities, conditions of particularly advantageous offers in relation to the customer's preferences/purchases made.

Legal basis of the processing: in the event that the purposes set out in point a) of this policy apply, the processing of the data collected is justified by the contract to which you are a party (Art. 6 lett. b GDPR) and by the fulfilment of legal obligations incumbent on the Controller (Art. 6 lett. c GDPR).

In the event that the purposes of point b) apply, the processing of the data collected is justified by the consent of the data subject (Art. 6 lett. a GDPR).

The legal basis of data processing carried out for the purpose referred to in point c) of this notice is legitimate interest (Art. 6 letter f GDPR).

Compulsory or optional nature of the provision of data: the provision of data for the purposes set out in point a) is compulsory. Without them it would be impossible to fulfil contractual and/or legal obligations. Therefore, your failure to provide them would in fact make it impossible for us to provide the services requested and to proceed further in order to fulfil them.

The provision of data for the purposes referred to in point b) is, on the other hand, optional. The data subject may, therefore, decide not to provide any data or subsequently refuse to process the data already provided. Processing will therefore only be carried out following the provision of explicit consent to processing. In the case envisaged by point c) of this information notice, it should be noted that the customer may interrupt the receipt of soft spam communications, without any consequences, by using the link that will be found at the bottom of the email received, or by sending a communication directly to the Data Controller at the addresses indicated below.

With reference to points a), b) and c) of this notice, the Data Controller also provides the following information:

Category of data processed: personal identification data (name, surname, place and date of birth, tax code no., identification document, tel., e-mail address, iban) of customers or the owner/referent of the company/legal entity.

Recipients of the data: the data collected in relation to the indicated purpose may be communicated to professional firms of lawyers, accountants, credit institutions, to the persons in charge/authorised by the Data Controller, to the data processors designated pursuant to Art. 28 of EU Reg. 2016/679, to insurance companies, to IT consultants/system administrators. Furthermore, the data may be communicated to public

bodies for the fulfilment of legal obligations.

The up-to-date list of data processors and persons in charge of processing is kept at the Data Controller's head office. The data will not be disclosed to third parties.

Duration of the processing: the data collected in connection with the aforesaid purposes shall be kept until the termination, for whatever reason, of the contractual relationship or for the longer duration upon expiry of the ordinary limitation period for contractual liability, without prejudice to special requirements for further data retention in connection with the contractual relationship that has taken place. If consent is given, the processing of personal data for the purposes referred to in point b) will be carried out by the Controller until the aforementioned consent is revoked.

Method of processing: the processing of data for the purposes set out above is carried out by means of electronic, computerised or paper media in compliance with the rules of confidentiality and security provided for by the above-mentioned regulations and other consequent regulations.

Transfer of data abroad: data collected in connection with the above-mentioned purpose are not transferred to non-EU countries.

The holder, however, reserves the right to use cloud services; in which case, the service providers will be selected from among those who provide adequate guarantees, as provided for in Article 46 GDPR 2016/679.

Automated decision-making processes: data collected in connection with the above-mentioned purpose are not subject to automated decision-making processes (including profiling).

Rights of the data subject: pursuant to EU Reg. 2016/679, the data subject has the right to

- access to personal data in order to know ('responsive transparency') the purposes of the processing, the categories of personal data collected, the recipients of the data communication, in particular if they are recipients from third countries or international organisations, the period of data retention envisaged (Art. 15);
- obtain rectification (Art. 16);
- the right to obtain the deletion of personal data if they are no longer necessary for the purposes for which they were collected and if there is no further legal need for their storage (Art. 17 GDPR);
- request restriction of processing (Art. 18);
- request data portability (Art. 20);
- Right to object to processing for reasons related to your particular situation (Art. 21 GDPR). In this case, we will refrain from further processing your data unless you demonstrate the existence of compelling legitimate grounds for processing (e.g. to defend your rights in court);
- not to be subject to automated decision-making, including profiling (Art. 22).

Finally, the data subject shall have the right to lodge a complaint with the Supervisory Authority pursuant to Article 13(2)(d) of the aforementioned regulation as well as pursuant to Article 77 of the regulation.

How to exercise your rights: you may at any time exercise your rights in accordance with Article 12 of EU Regulation 2016/679 by sending a:

- registered letter with return receipt to: "FABIO BENELLI", with registered office in Genoa, Via Oliveto 1/8,

- PEC: : fabiobenelli@pec.it

- e-mail: info@fabiobenelli.com