

## **PERSONAL DATA PROCESSING GENERAL INFORMATION NOTICE (Articles 13-14, EU Regulation no. 2016/679 and current Italian legislation)**

**Advantech Time s.r.l.** with registered office in Udine, no.1 Sondrio Street, VAT reg. no. 02767580307 mail [admin@advantech-time.com](mailto:admin@advantech-time.com) in its capacity **Data Controller**, pursuant to and for the purposes of **Articles 13-14 EU Regulation no. 2016/679** and of current Italian legislation, would like to inform you that your personal data will be processed in accordance with the following methods and purposes:

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### **1.Data collected and processed**

The Data Controller collects and processes

- Personal data of CUSTOMERS/SUPPLIERS provided during the establishment of the contractual relationship and during its execution (including for example: name, surname, identity document, tax code, address, e-mail, telephone number), as well as payment data (information regarding payment methods e.g. bank details) or when subscribing to our “Newsletter”;
- Personal Data optionally provided by WEBSITE USERS by browsing the firm’s website concerning preferences and interests (such as in particular: contents used, use of services, features used, connection times, traffic data, site browsing data and social profiles of the Data Controller or of commercial partners or third parties, IP address, devices and connection used) collected also by means of cookies and metadata;
- Personal data of EMPLOYEES/SELF EMPLOYED PEOPLE mandatorily requested by law, regulation, Community law or for the establishment of the contractual relationship and during its execution (such as: name, surname, permanent address, contact information, etc.), data indicating health status/suitability or unsuitability to perform specific tasks, trade union

orientation, religious or political beliefs communicated when subscribing an employment contract and/or managing the employment relationship, data relating the attendance at work communicated during management of the employment relationship and data related to the use of the company's information technology equipment (e.g. e-mail, internet history, phone calls etc.) collected in the event of investigations on the Firm's tool and information security;

- Personal data provided when you APPLY FOR A JOB and/or provided by the employee, if relevant for the professional skills, which are manifestly made public by the data subject by publishing them on social networks;

## **2. Purpose and legal grounds of data processing**

The personal data described above may be processed for the following purposes:

### **A) to fulfil a contract and Data processing is legitimate since the legal ground is based on the need to:**

- perform the contract or fulfil the Data Controller's contractual obligations;
- fulfil pre-contractual, contractual and tax obligations resulting from the relationship outstanding with you;
- fulfil obligations arising from either from laws, regulations, Community law or an order issued by an Authority (such as those regarding to money laundering);
- exercise the Data Controller's rights (for example to allow the Data Controller to defend himself in legal proceedings, or prior to legal proceedings)

### **B) for the purpose of marketing and Data processing is legitimate since the legal ground for the same is based on the express consent provided to:**

- receive by e-mail, mail and/or text messages and/or telephone, newsletters, informative and commercial communications and/or advertising material on products or services offered and surveys on customer satisfaction on services quality;
- receive by e-mail, mail and/or text messages and/or telephone, informative, commercial and/or promotional communications from third parties (for example, business partners).

### **C) for the purpose of direct marketing and Data processing is legitimate since the legal ground for the same is based on the legitimate interest of the Data Controller to:**

- to send you commercial communications relating to services and similar products to those you have already used.

**D) for the purpose of profiling and Data processing is legitimate since the legal ground for the same is based on the consent to:**

- legitimise the analysis, including automated analysis, of preferences and interests (for example, use of content and services, including those purchased, features used, connection times, traffic data, etc.) and allow commercial proposals (with ordinary letters, telephone calls, emails, text messages, MMS, notifications and newsletters) of personalised services, content, initiatives and offers;
- legitimise the analysis, including automated analysis, of use of services, preferences and interests (for example, access, use of content and services, features used, traffic data, etc.) and allow commercial proposals (with ordinary letters, telephone calls, emails, text messages, MMS, notifications and newsletters) of services, content, initiatives and offers personalised for you;

**E) for the purpose of protecting company security and Data processing is legitimate since the legal ground for the same is based on the legitimate interest to:**

- protect information technology systems and confidential and non-confidential company information
- defend own rights in court

It is always possible for you to ask the Data Controller about the purpose and the legal grounds of each such data processing.

### **3.Data processing methods**

Your personal data will be processed as hard copy and in a digital form. All data will be processed in accordance with principles of correctness, lawfulness and transparency and may also be performed by using automated procedures designed to store, manage and transmit personal data using appropriate tools to ensure the security and confidentiality of the same by means of appropriate procedures that prevent the risks of loss, unauthorised access, unlawful use and dissemination of data.

### **4.Communication of personal data**

Your personal data may be provided to authorised personnel and/or data processors (such as persons who supervise the computer system [system administrators]), companies and/or professional partnerships that provide accounting, administrative, tax, legal, fiscal and finance assistance and advice (accountants, employment consultants, lawyers, etc.), subjects operating in the legal sector, counterparties and their legal representatives, collegiate arbitration

courts and, in general, all public bodies (INPS [National Institute of Social Insurance], INAIL [National Institute for Industrial Accident Insurance], INL [Italian Employment Inspectorate], etc.) and private entities (funds, pension and assistance funds, trade unions, etc.), to whom your data must be communicated for the correct performance of the contract with this company.

The list of professionals and companies to whom your data are communicated is always available on request.

### **5.Period of retention**

The Personal Data is processed and stored for the time requested by the purposes for which it was collected. The Data Controller retains any personal data processed for the purpose of performing a contract for the period of time required to manage any contractual obligations and in any event for no longer than **10 years**; any personal data processed for marketing purposes (including indirect marketing) and/or customer satisfaction surveys are retained for no longer than **24 months** from receipt of the customer's consent; any personal data processed for profiling purposes is retained for no longer than **12 months** from receipt of the customer's consent; data concerning navigation logs is retained for **3 months**; any personal data processed to defend a right will be retained for the period time reasonably necessary for any such purposes and for the period time in which said claim may be pursued. Once the above terms of retention have expired, the data will be made anonymous and processed for aggregate and anonymous statistical analysis. At the end of the retention period the Personal Data will be deleted. Therefore, at the end of this term the right of access, cancellation, rectification and the right to data portability can no longer be performed.

### **6.Data Transfer**

Personal data may also be communicated to the Data Controller's offices and/or to offices of other associated/subsidiary companies inside and/or outside the EU, which, in their capacity as Joint Data Controllers, have signed an agreement with the Data Controller. These offices - with particular attention to those located in non-EU countries - have been provided with detailed operating instructions by means of contractual clauses that guarantee that personal data will be processed in accordance with the principles established in EU Regulation no. 2016/679 even to non-EU third countries of destination. The Data Controller reserves the right to use cloud services, undertaking to select service providers from those providing adequate safeguards, as set out in Article 46 of EU Regulation no. 2016/679.

## **7.Rights of the data subjects**

You are entitled to request from the Data Controller access to and rectification or erasure of your personal data, to have incomplete personal data completed or restrict the processing of any personal data provided. You are also entitled to receive any personal data concerning you in a structured, commonly used and machine-readable format. You also have the right to withdraw your consent to processing at any time and to object in full or in part to the processing of your personal data. You are further entitled to lodge a complaint with the supervisory authority and to exercise the other rights recognised to you pursuant to Articles 15 - 22 of EU Regulation no. 2016/679.

## **8.How to exercise your rights**

You may exercise your rights at any time by contacting the Data Controller by sending an e-mail to: [admin@advantech-time.com](mailto:admin@advantech-time.com) which will be processed as soon as possible or by lodging a complaint with the supervisory authority.

If you are no longer interested in our communications and would like to cancel your subscription to the Newsletter, click on the “cancellation” link at the bottom of each e-mail sent or send an e-mail to [admin@advantech-time.com](mailto:admin@advantech-time.com)

To stop receiving promotional e-mails, please follow the relevant instructions or send a notification to [admin@advantech-time.com](mailto:admin@advantech-time.com)

## **9.Amendments and updates**

This information notice may be amended. Please refer to our website, company notice boards and other channels made available for updates.

If you have any questions or concerns about our use of your personal information, please contact us using the above-mentioned details.

Udine, 6<sup>th</sup> November 2018

**Advantech Time s.r.l.**

Last update: 25<sup>th</sup> May 2018