

Policy for customers

NILVIA S.R.L., VIA TRIESTE N. 26/A/1 - 36065, MUSSOLENTE - VI, VAT number: 01468030240, informs you, pursuant to Article 13 of the EU Reg. 2016/679 (General Data Protection Regulation, henceforth "GDPR"), concerning the essential elements of the processing of data carried out and illustrated below.

The categories of personal data processed

We use personal, identifying and non-sensitive data provided by you (such as: name, surname, fiscal code, tax information, contact details, billing address).

Purpose and legal basis of processing

The personal information you provide allows us to carry out all the activities covered by the contract and meet your needs, and to carry out all activities related to the fulfilment of our obligations, such as administrative, tax and accounting activities.

Specifically, your personal data is processed for the following purposes and legal bases:

- **activities related to execution of the contract to which you are a party, including the pre-contractual phase** (examples of activities are: the acquisition of information preliminary to the conclusion of the contract, communication of requests and/or responses to requests received, management of reports for administration, accounting, orders, shipments, billing, services, fulfilment of legal obligations); the **legal basis** for the above purpose is identified in the contract and pre-contractual measures (Art. 6.1, letter b, GDPR);
- **activities connected with the assessment and/or exercise and/or defence of rights** (examples of activities are: disputes relating to the correct fulfilment of the contractual relationship, reminders, debt collection); the **legal basis** for the aforementioned purpose is identified in the legitimate interest (Art. 6.1, f, GDPR);
- **conservation of accounting records**; the **legal basis** is the legal obligation (Art. 6.1, letter c, GDPR);
- **other activities in execution of legal obligations/authorities' orders** (such as, for example, communication to third parties); the **legal basis** is identified in the legal obligation (Art. 6.1, c, GDPR).

None of our processing is based on consent. The legal bases on which we operate are: contract, legal obligation and legitimate interest.

We do not carry out processing with automated decision-making processes or profiling.

Data retention times

Your personal data will be stored for the periods of time strictly necessary to achieve the primary purposes as indicated above and to comply with the provisions of laws.

In particular, for the **activities connected to the execution of the contract to which you are a party (including the pre-contractual phase)**, your personal data will be kept for the duration of the contractual relationship and, once the relationship is concluded, will be kept for needs of ascertainment/exercise/defence of rights; for **activities related to the assessment and/or exercise and/or defence of rights**, your personal data is stored for 10 years, the normal limitation period (Art. 2946 of the Italian Civil Code), unless the data has to be stored for longer due to interruption of the limitation;

for the **activities relating to storage by law**, your personal data will be kept for 10 years for the purpose of mandatory archiving *pursuant to the law* (Articles 2220 of the Italian Civil Code; 22, paragraphs 2 and 3 of Presidential Decree 29.9.1973, no. 600), subject to further storage in the event of interruption of the regulation; for other **activities in execution of legal obligations/orders by the Authorities**, referring to personal data available to us for the other purposes indicated in this Policy, the storage times coincide with those identified from time to time for the above purposes.

Consent and optional/compulsory nature of providing data.

The processing of your personal data, for the purposes described above, may be carried out without your consent.

Data provision is mandatory because data communication is a contractual obligation and required to comply with the law and/or regulations, and is also a necessary requirement for conclusion of the contract. Failure to provide your personal data for the aforementioned purposes will, therefore, make it impossible for us implement contracts and other related obligations, as well as to properly manage trading relationships.

Categories of recipients of data

Your personal data may be disclosed to third parties for technical and operational purposes strictly related to the purposes set out above and in particular to the following categories of persons:

- a) entities, professionals, companies or other establishments entrusted by us with the processing related to the fulfilment of contractual, administrative, accounting, insurance and management obligations related to the ordinary performance of our economic activity, including for the purpose of credit recovery;
- b) public authorities and administrations for purposes connected with the fulfilment of legal obligations or persons entitled to access such data by virtue of provisions of Community law, regulations or legislation;
- c) banks, financial institutions or other entities to which the transfer of such data is necessary for the performance of our company's business activity in relation to the performance of our contractual obligations towards you;
- d) providers of installation, assistance and maintenance services for IT and telematic facilities and systems, as well as all the services functionally connected to and necessary for fulfilment of the contract;
- e) persons authorised by us to process data who have committed themselves to confidentiality or have an appropriate legal obligation of confidentiality (e.g. employees and collaborators).

Transfer abroad

The Data Controller shall not transfer personal data outside the European Economic Area. The Controller, however, reserves the right to use services in the *cloud*, in which case the service providers will be selected from those who provide adequate guarantees in accordance with applicable law.

Data processing procedure

Your personal data will be processed both in electronic and paper format.

However, the processing will be carried out mainly with computer tools and in any case with the observance of the minimum precautionary measures of security and data confidentiality.

In particular, technical, IT, organisational, logistical and procedural security measures have been implemented to prevent the loss, unlawful or irrelevant use of, and unauthorised access to, data.

Rights of the data subject and complaints to the Supervisory Authority

We inform you that you can exercise the following rights with regard to the processing of your personal data:

- a) **Right to obtain access to your personal data** (Art. 15, GDPR): you can contact us to find out if your personal data is being processed and the information required by law on processing;
- b) **Right of rectification** (Art. 16, GDPR): to obtain the correction of your inaccurate personal data or the integration of incomplete data;
- c) **Right to cancellation/oblivion** (Art. 17, GDPR): obtain the cancellation of your personal data, in the cases provided for by law;
- d) **Right to the limitation of processing** (Art. 18, GDPR): to obtain the submission of your personal data to the storage only, with the exclusion of other activities, in the hypotheses provided for by the law;
- e) **Right to portability** (Art. 20, GDPR): to obtain your personal data in a structured format, of common use and readable by automatic devices and also to obtain the direct transfer to another data controller for the processing, in the hypotheses provided for by the law;
- f) **Right to oppose** (Art. 21, GDPR): right to stop further processing of personal data for reasons related to your particular situation, unless our legitimate reasons prevail, in the cases provided for by law;
- g) **Right to withdraw consent** (Art. 7.3, GDPR): right to withdraw consent at any time in cases where processing is based on consent.

To exercise the above rights, you can use the Controller's contact details provided in this Policy. The exercise of the rights is not subject to any formal constraint and is free of charge.

We also inform you of your right to make a **complaint before the competent authority** for personal data protection. We remind you that complaints, according to Art. 77.1 of the GDPR, can be filed by data subjects with the Authority of the place where the data subjects habitually reside, where they work or where the alleged violation occurred.

Owner of the Treatment

The Owner of the Treatment is the company
NILVIA S.R.L. Contact data of the Owner of
the Treatment:

- e-mail: amministrazione@nilvia.it
- telephone: +39 0424 36591
- VIA TRIESTE N. 26/A/1 - 36065, MUSSOLENTE - VI - ITALY

Amendments

This Policy has been in force since 25 May 2018. We reserve the right to modify or simply update the content, in part or in full, also due to changes in the applicable legislation. We will inform you of these changes as soon as they are introduced.