

INFORMATION ON THE PROCESSING OF PERSONAL DATA - CLIENTS AND SUPPLIERS **(Rev 1.0 of 10.01.2023)**

Pursuant to and for the purposes of art. 13 EU Reg. 2016/679 (GDPR) and art. 13 Legislative Decree 196/2003 (Privacy Code).

Dear Company

pursuant to art. 13 EU Reg. 2016/679 (GDPR) and of the Privacy Code as well as in relation to the identification, personal and fiscal data of which the company **ATS MICROFUSIONE SRL**, as **Data Controller**, will come into possession in the context of the contractual relationships in progress, we inform you of the following:

PURPOSE OF DATA PROCESSING AND LEGAL BASIS

Personal data are processed for the following purposes:

- a) Allow an effective management of commercial relationships and the fulfillment of contractual obligations;
- b) Allow the exercise of the rights and legitimate interests of the Data Controller, for example the right to defense in court;
- c) Allow the fulfillment of the obligations provided for by the current regulations.

The processing of personal data is to be considered lawful pursuant to art. 6 GDPR as:

- it's necessary for the performance of the contract of which you are a party;
- it's necessary for the pursuit of the Data Controller's legitimate interest;
- it's necessary for the fulfillment of a legal obligation to which the Data Controller is subject.

PROCESSING METHODS

The processing is carried out by means of the operations or set of operations indicated in the art. 4 paragraph 1 left. a) Privacy Code and Art. 4 no. 2) GDPR and precisely:

- collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.

The processing operations can be carried out using paper, IT or telematic tools and with adequate security measures to guarantee the security and confidentiality of your personal data.

DATA CONTROLLER

The data controller is the company **ATS MICROFUSIONE SRL**, with **registered office in Via Natta 5, Mapello (BG)- 24030 and operational headquarters in Via Primo Maggio 1-4 Sasso Marconi (BO)- 40037** in the person of the legal representative **Mr Manuel Cortinovis**

JOINT CONTROLLER OF THE PROCESSING

- The joint controller of the processing is the company **GFM SPA**, with registered office in **Via Natta 5, Mapello (BG)- 24030** in the person of the legal representative **Mr Manuel Cortinovis**
- The joint controller of the processing is the company **FLAG SRL**, with registered office in **Via Alfieri 3, Tavagnacco (UD)- 33010** in the person of the legal representative **Mr Bottalico Saverio**

DATA RECIPIENTS

Within the scope of the aforementioned purposes, the data may be communicated to employees and collaborators within the Data Controller's company in their capacity as persons in charge of processing, who process them according to the specific provisions given.

Outside the Data Controller's company, the data may be communicated to external collaborators and to companies that provide services to the Data Controller as Data Processors or independent Data Controllers.

The updated list of data processors is available by sending an email to: info@atsmicrofusione.com

The data can be communicated to all those public and private entities whose right to access the data is recognized by legal provisions or by orders from the authorities.

TRANSFER OF DATA ABROAD

Where necessary for the fulfillment of the aforementioned purposes, the Data Controller may transfer the data to a third country. In this case, the Data Controller ensures from now on that the transfer of data outside the EU will take place in compliance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses envisaged by the European Commission.

DATA RETENTION

In compliance with the principles of proportionality and necessity, the data will not be stored for periods longer than those necessary. They will therefore be kept for the entire duration of the contractual relationship, and in any case no later than 10 years from the end of the relationship, in compliance with the current regulations.

RIGHTS OF THE DATA SUBJECT

a) right of access: the data subject has the right to obtain confirmation as to whether or not personal data concerning him is being processed and, if so, to obtain access to personal data and the following information: origin of the data; purpose of the processing; categories of personal data in question; the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if recipients from third countries or international organizations, and the existence of adequate guarantees; the envisaged retention period of the personal data or, if this is not possible, the criteria used to determine this period; existence of the right to request the rectification or cancellation of personal data (right to be forgotten) or the limitation of treatment, or to oppose their treatment; the right to lodge a complaint with a supervisory authority.

b) right of rectification: the data subject has the right to obtain the rectification of inaccurate personal data, without unjustified delay, as well as the right to obtain the integration of incomplete personal data, also by providing a supplementary declaration.

c) right of cancellation (right to be forgotten): the data subject has the right to obtain the cancellation of personal data concerning him without unjustified delay. He also has the right to have data processed in violation of the law transformed into anonymous form or blocked, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed.

d) right to the limitation of the processing: the data subject has the right to obtain limitation of processing in the cases provided for by art. 18 of the GDPR.

e) right of opposition: the data subject has the right to oppose the processing of data at any time in the cases provided for by art. 21 of GDPR.

f) right to portability: the data subject has the right to receive personal data concerning him or her in a structured, commonly used format that can be read from an automatic device and has the right to transmit such data to another data controller without impediments by the owner to whom it provided them.

g) right to lodge a complaint with the supervisory authority: the data subject who thinks that the processing that concerns him violates the Regulation has the right to lodge a complaint with a supervisory authority, especially in the Member State in which he habitually resides, works or the place where the alleged violation occurred.

METHOD OF EXERCISING RIGHTS

The rights referred to in the previous article can be exercised at any time through:

- registered letter to the following address: **ATS MICROFUSIONE – operational headquarters- Via Primo Maggio 1-4 Sasso Marconi (BO)- 40037**
- email to the address: info@atsmicrofusione.com

NATURE OF DATA PROVISION AND CONSEQUENCES OF REFUSAL

The provision of data is mandatory for all that is required by legal and contractual obligations and therefore any refusal to supply them or to subsequent processing may determine the impossibility of the undersigned company to proceed with the contractual relationships; on the other hand, failure to provide all data that is not attributable to legal or contractual obligations will be assessed from time to time by the undersigned company and will determine the consequent decisions related to the importance of the data requested with respect to the management of the commercial relationship.

Kind Regards

ATS MICROFUSIONE SRL