

INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA

(As per articles 13 - 14 of EU Regulation 2016/679 and Italian Legislative Decree 196/2003 in light of Italian Legislative Decree 101/2018)

To whom it may concern,

We provide certain information below which needs to be brought to your attention, not only in order to comply with our legal obligations, pursuant to EU Regulation 2016/679, but also because transparency and correctness towards our customers is a fundamental part of our business.

The Controller, in terms of processing personal data, is the PALLADIO GROUP, identified as a “group of undertakings” as established by article 4.19 of EU Regulation 679/2016 and which is liable towards you with regard to the correct use of your personal data and who you may contact for any information or request at the following addresses:

The “group of undertakings” has appointed a Data Protection Officer, who may be contacted at: dpo@palladiogroup.it

Controller: PALLADIO GROUP IN THE PERSON OF THE PARENT COMPANY, PALLADIO GROUP SPA
 Offices: via Cresole, 8 - 36031 Dueville (VI), ITALY

Contact details:

Telephone	+39 0444 947111
Email	info@palladiogroup.com
Website	www.palladiogroup.com

Your personal data is collected and processed for the purposes given below, together with the legal basis of reference:

Processing: Sale of goods

Purposes	Data processed	Legal basis	Duration
Offers of goods	Name, address, or other elements of personal identification; Contact details (telephone number, email address, etc.)	Pre-contractual, contract	10 years from the year in which the service is provided
Newsletters (informational material related to the products purchased)	Name, address, or other elements of personal identification; contact details (telephone number, email address, etc.)	The Controller's legitimate interests in promoting goods and services	10 years from the year in which the service is provided

Categories of recipients: Your data will not be sent to any third party.

Processing: Customer Management

Purposes	Data processed	Legal basis	Duration
Customer management	Tax Code and other personal identification numbers; Name, address, or other elements of personal identification; Contact details (telephone number, email address, etc.)	Contract	10 years from the year in which the last contract is terminated

Categories of recipients: Your data may be communicated to consultants and freelance professionals in both singular and associated form; Banks and credit institutions; Companies and other firms.

Processing: Reception

Purposes	Data processed	Legal basis	Duration
Monitoring people who enter the company	Name, address, or other elements of personal identification; Contact details (telephone number, email, etc.); Stated profession	The Controller's legitimate interests	1 year from the year in which the data is acquired
Filtering telephone calls	Name, address, or other elements of personal identification; Contact details (telephone number, email, etc.); stated profession	The Controller's legitimate interests	1 year from the year in which the data is acquired

Categories of recipients: Your data will not be sent to any third party.

Processing: Accounting

Purposes	Data processed	Legal basis	Duration
Keeping accounting records	Tax Code and other personal identification numbers; Name, address, or other elements of personal identification; data on economic, sales, financial, and insurance activities	Legal obligation	10 years from the accounting year

Tax compliance	Tax Code and other personal identification numbers; Name, address, or other elements of personal identification; data on economic, sales, financial, and insurance activities	Legal obligation	10 years from the accounting year
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Categories of recipients: Your data may be communicated to consultants and/or freelance professionals in both singular and associated form.

Processing: Invoicing and Transport Documents

Purposes	Data processed	Legal basis	Duration
Shipping goods	Name, address, or other elements of personal identification	Contract	10 years from the year in which the service is provided

Categories of recipients: Your data will not be sent to any third party.

Processing: Management Control

Purposes	Data processed	Legal basis	Duration
Internal corporate management control	Tax Code and other personal identification numbers; name, address, or other elements of personal identification; data on economic, sales, financial, and insurance activities; work (current occupation, prior, curriculum vitae, etc.);	The Controller's legitimate interests in analytically verifying proper corporate management	10 years from the year in which the service is provided

Categories of recipients: Your data will not be sent to any third party.

Processing: Quality Control

Purposes	Data processed	Legal basis	Duration
Checking the quality of goods	Tax Code and other personal identification numbers; Name, address, or other elements of personal identification; Product quality certificates	The Controller's legitimate interests in checking the quality of the goods supplied	10 years from the year in which the service is provided

Categories of recipients: Your data may be communicated to consultants and/or freelance professionals in both singular and associated form, companies and other firms

Processing: Customer Service

Purposes	Data processed	Legal basis	Duration
Measuring customer satisfaction	Name, address, or other elements of personal identification; Tax Code and other personal identification numbers; behaviour data, user profiles, consumer profiles, etc.; contact details (telephone number, email, etc.)	Contract	10 years from the year in which the last contract is terminated
Customer support	Name, address, or other elements of personal identification; Tax Code and other personal identification numbers; behaviour data, user profiles, consumer profiles, etc.; contact details (telephone number, email, etc.)	Contract	10 years from the year in which the last contract is terminated

Recipients: Your data will not be sent to any third party.

Processing: Marketing

Purposes	Data processed	Legal basis	Duration
Market research and analysis	Tax Code and other personal identification numbers; name, address, or other elements of personal identification; data on economic, sales, financial, and insurance activities; contact details (telephone number, email, etc.)	Consent	Until consent is revoked. Data will be stored for 10 years from the year in which consent is revoked
Sending informational material and/or advertisements, including by telephone or the internet, relating to the Company's business	Tax Code and other personal identification numbers; name, address, or other elements of personal identification; data on economic, sales, financial, and insurance activities; contact details	Consent	Until consent is revoked. Data will be stored for 10 years from the year in which consent is revoked

	(telephone number, email, etc.)		
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Recipients: data will not be disclosed.

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*Duration: In addition to the time needed for the prescribed terms to expire in relation to each party's rights.

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CHANGES TO THIS PRIVACY POLICY

The Controller reserves the right to make changes to this privacy policy at any moment and data subjects will be notified. In the event that a data subject does not accept the changes made to this privacy policy, he/she may ask the Controller to delete his/her Personal Data.

Unless specified otherwise.

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Transferring data outside the EU

Personal Information can be transferred to recipients in USA, those recipients adopt the appropriate safeguards including standard data protection clauses provided for in the article 46 of Reg. UE 679/2016.

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In addition to this information, in order to ensure that your data is processed in the most correct, most transparent way possible, you should be aware that:

- Except for consent-based purposes, supplying your data is a necessary requirement, otherwise providing the goods or service requested will not be possible;
- you have the right to ask the Controller for access to your personal data and to have this data rectified or erased. You also have the right to restrict processing of the data that concerns you and to object to your data being processed;
- if you have provided your consent for one or more specific purposes, you have the right to revoke such consent at any time;
- you have the right to lodge a complaint with a Supervisory Authority. In Italy, this is: the Italian Data Protection Authority [Garante per la protezione dei dati personali];
- data will be processed with automated, semi-automated and manual means;

Where provided for by this document, you have a legal obligation to provide your data, otherwise you may be subject to sanctions as per the law.

Dueville (VI), 19/09/2019
Palladio Group