

INFORMATION LETTER ON THE PROCESSING OF PERSONAL DATA

(Ex art. 13 – 14 EU reg. 2016/679 and Legislative Decree 196/2003 in the light of
Legislative Decree 101/2018)

Dear Interested,

below we provide you with some information that you need to bring to your knowledge, not only to comply with the obligations set out in EU Reg. 2016/679, but also because transparency and fairness towards our customers are a fundamental part of our business.

The Data Controller of your personal data is **PALLADIO GROUP** identified according to the definition of "entrepreneurial group" established by art. 4.19 EU Reg. 679/2016 and responsible towards you for the legitimate and correct use of your personal data and who you can contact for any information or request at the following contact details:

The group has appointed a Data Protection Officer, who can be contacted at:

dpo@palladiogroup.it

Data Controller: **PALLADIO GROUP IN THE PERSON OF THE PARENT COMPANY PALLADIO GROUP SPA**

Headquarters: Via Cresole n. 8, 36031 Dueville (VI), IT

Contacts and contact details:

Telephone	+39 0444 947111
E-mail	info@palladiogroup.com
Website	www.palladiogroup.com

Data source: data are collected from the interested party and/or from third parties and/or sources accessible to the public.

Your personal data are collected and processed for the purposes set out below together with the legal basis of reference:

Data Processing: Sales and commercial activity prior to the sales

Purpose	Data Processed	Legal basis	Duration
Offer of goods and services	Name, address or other personally identifiable elements; Contact details (phone number, email, etc.)	Precontractual, contract	10 years from the year of execution of the service

Promotional activities: Newsletter (information material related to the products purchased)	Name, address or other personally identifiable elements; Contact details (phone number, email, etc.)	Legitimate interest of the Data Controller to promote goods and services	10 years from the year of execution of the service
--	--	--	--

Categories of recipients: Consultants and freelancers individually or in partnership; Banks and credit institutions, companies and societies instrumentally related to the indicated purpose.

Processing: Customer Management

Purpose	Data Processed	Legal basis	Duration
Management of Customers	Fiscal code and other personal identification numbers; Name, address or other personally identifiable elements; Contact details (telephone number, email, etc.)	Contract	10 years from the year of termination of the last contract

Categories of recipients: Consultants and freelancers individually or in partnership; Banks and credit institutions, companies and societies instrumentally related to the indicated purpose.

Processing: Reception

Purpose	Data Processed	Legal basis	Duration
Monitoring of people entering the company	Name, address or other elements of personal identification; Contact details (phone number, email, etc.); declared profession; information necessary for the fulfillment of legal obligations regarding the containment of the COVID 19 pandemic.	Legitimate interest of the Data Controller in monitoring people who enter the company, legal obligation limited to the fulfillment of legal obligations regarding the containment of the COVID 19 pandemic.	1 year from the year of data acquisition; retention period imposed by legislation with regard to the fulfillment of legal obligations regarding the containment of the COVID 19 pandemic.
Filtering of phone calls	Name, address or other elements of personal identification; Contact details (phone number, email, etc.);	Legitimate interest of the Data Controller in the filtering of phone calls.	1 year from the year of data acquisition

	declared profession		
--	---------------------	--	--

Categories of recipients: The data will not be disclosed to any recipient with the exception of what may be provided for by the legislation on the containment of the COVID-19 pandemic, to subjects authorized to process under the responsibility of the data controller, to data processors appointed ex. art. 28 EU Reg. 679/2016.

PROCESSING: Accounting

Purpose	Data Processed	Legal basis	Duration
Keeping of accounting records	Fiscal code and other personal identification numbers; Name, address or other elements of personal identification; economic, commercial, financial, insurance activities; Contact details (telephone number, email, etc.);	Legal obligation	10 years from the relevant year
Tax compliance	Fiscal code and other personal identification numbers; Name, address or other elements of personal identification; economic, commercial, financial, insurance activities; Contact details (telephone number, email, etc.);	Legal obligation	10 years from the relevant year

Categories of recipients: Consultants and freelancers individually or in partnership; Banks and

credit institutions, companies and societies instrumentally related to the indicated purpose.

Processing: Issue of bills and transport documents

Purpose	Data Processed	Legal basis	Duration
Shipping of goods	Name, address or other elements of personal identification	Contract	10 years from the relevant year

Categories of recipients: Consultants and freelancers individually or in partnership; Banks and credit institutions, companies and societies instrumentally related to the indicated purpose, including companies in the logistics and shipping sector.

PROCESSING: Management Control

Purpose	Data Processed	Legal basis	Duration
Internal control of company management	Fiscal code and other personal identification numbers; name, address or other elements of personal identification; data relating to economic, commercial, financial and insurance activities; job (current, previous job, CV etc.); role covered in the company	Legitimate interest of the data controller	10 years from the relevant year

Categories of recipients: Your data could be communicated to consultants and freelancers individually or in groups, companies and societies instrumentally related to the indicated purpose.

Processing: Quality

Purpose	Data Processed	Legal basis	Duration
Verification of the quality of goods and services	Fiscal code and other personal identification numbers; name, address or other elements of personal identification; Product quality certificates	Legitimate interest of the data controller to verify the quality of the goods and services received	10 years from the year of data collection

Category of recipients: The data could be communicated to consultants and freelancers in single or associated form, companies and businesses including certification and accreditation bodies.

Processing: Customer Service

Purpose	Data Processed	Legal basis	Duration
Detection of the degree of customer satisfaction	Name, address or other elements of personal identification; tax code and other personal identification numbers; behavioral data, user profiles, consumers, etc.; contact details (telephone number, e-mail, etc.)	Contract	10 years from the year of termination of the last contract
Customer Support	Name, address or other elements of personal identification; tax code and other personal identification numbers; behavioral data, user profiles, consumers, etc.; contact details (telephone number, e-mail, etc.)	Contract	10 years from the year of termination of the last contract

Categories of recipients: Consultants and freelancers individually or in partnership; Banks and credit institutions, companies and societies instrumentally related to the indicated purpose.

Processing: Marketing

Purpose	Data Processed	Legal basis	Duration
Marketing (analysis and market surveys)	Fiscal code and other personal identification numbers; Name, address or other elements of personal identification; Economic, commercial, financial, insurance activities; Contact details (telephone number, email, etc.)	Consent	Until withdrawal of consent. The data will be kept for 10 years from the year in which the consent was revoked

Sending of informative and/or advertising material also by telephone or internet	Fiscal code and other personal identification numbers; Name, address or other elements of personal identification; Economic, commercial, financial, insurance activities; Contact details (telephone number, email, etc.)	Consent	Until withdrawal of consent. The data will be kept for 10 years from the year in which the consent was revoked
--	---	---------	--

Categories of recipients: Consultants and freelancers individually or in partnership; firms and companies instrumentally related to the indicated purpose.*

***Duration:** In addition to the time necessary for the accrual of the prescription terms in relation to reciprocal rights and the backup retention time.

*

CHANGES TO THIS PRIVACY POLICY

The Data Controller reserves the right to make changes to this privacy policy at any time, notifying the interested parties. In case of non-acceptance of the changes made to this privacy policy, the interested party may request the Data Controller to remove their Personal Data.

Unless otherwise specified.

*

DATA TRANSFER OUTSIDE EU

The processing of personal data (e.g. storage, archiving and conservation of data on its own servers or in the cloud) will be limited to the areas of circulation and processing of personal data in countries belonging to the European Union, with the express prohibition of transferring them to countries outside the EU that do not guarantee (or in the absence of) an adequate level of protection, or, in the absence of protection instruments provided for by EU Regulation 2016/679 (third country deemed adequate by the European Commission, group BCR, model contractual clauses, consent of interested parties, etc.).*

In addition to this information, to ensure that your data is processed as correctly and transparently as possible, you must be aware of the fact that:

- Except for the purposes based on consent, the provision of your data is a necessary requirement, otherwise it will not be possible to supply the goods or provide the requested service;
- you have the right to ask the data controller to access your personal data and to rectify or cancel them or limit their processing or to oppose their processing;

- if you have given consent for one or more specific purposes, you have the right to revoke this consent at any time;
- you have the right to lodge a complaint with the following Supervisory Authority: Guarantor for the protection of personal data;
- the data will be processed using automated, semi-automated and non-automated methods;

Where required by this information letter, you have a legal obligation to provide your data otherwise you are subject to sanctions as required by law.

Dueville (VI), 26/04/2022

Palladio Group