

## 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:

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

Data Protection Officer (DPO):

[dpo@palladiogroup.com](mailto:dpo@palladiogroup.com)

**Data source:** data are collected from the interested party and/or from third parties such as other customers and/or suppliers 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:

### 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	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.	pandemic.
Filtering of phone calls	Name, address or other elements of personal identification; Contact details (phone number, email, etc.); declared profession	Legitimate interest of the Data Controller in the filtering of phone calls.	1 year from the year of data acquisition

**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: Video surveillance**

Purpose	Data Processed	Legal basis	Duration
Protection of the property	Images; Video recordings;	Legitimate interest of the owner	Plants Dueville, Pontedera real-time display, Plant Thiene 7 days

**Category of recipients:** Public security bodies, judicial authority, free professionals.

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

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**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.

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**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.).

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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**