

To: Mr./Ms./Company

Subject: Privacy notice pursuant to Articles 13 and 14 of the GDPR (EU) 679/2016, and to national personal data processing laws in force, related to contracts with customers

The undersigned company, in its capacity as **Data Controller**, represented by the legal representative *Perin Celestino*, pursuant to Article 13 of Regulation (EU) 679/2016, hereby informs its customers about the purposes and methods of processing of any personal data collected, about the context in which such data are communicated and disseminated and also about the legal status of the data provision.

Personal data processed

The term "data" refers to data and information pertaining to natural persons which the Company processes in order to enter into and implement the contractual relationship, namely identification data and administrative, accounting, tax and commercial data (in digital form or otherwise) which relates directly to the customer or, where the data is essentially for identification and IT purposes, to data subjects (e.g. employees, non-company collaborators, coordinators etc.), which they communicate in the context of dealings with the Data Controller and in compliance with applicable provisions on the processing and protection of personal data.

Purposes of the data processing

Personal data provided will be processed by reference to the contractual obligations underlying the business relationship:

- as a necessary preliminary to entering into contracts. Where the data subject enters into contracts and/or makes purchases directly (also using the Data Controller's website), note that the data provided (also using the special form on the dedicated information page on entering data on the website) will be processed in order to facilitate implementing the contractual obligations undertaken (and/or any necessary pre-contractual activities) or to give effect to the order request, and for purposes related and instrumental to its management and to after-sales activities, including complaints management;
- in order to fulfil obligations and implement transactions provided for in the contracts entered to;
- in order to implement obligations and compliance requirements (administrative, accounting and tax, etc.) provided for by applicable laws;
- in order to transmit information messages and commercial and promotional communications related to the Data Controller's activity, products and services, using automated communications methods such as e-mail and sms or traditional ones such as operator telephone contact, in full compliance with the principles of legality and correctness and also with applicable provisions of law in force.

Legal basis for the data processing

The Company legitimately processes personal data if the data processing in question:

- is required in order to implement the contract to which the data subject is a party;
- is required in order to fulfil a legal obligation incumbent on the Company;
- is expressly consented to (transmission of information messages and commercial and promotional communications related to the Data Controller's activity, products and services, using automated communications methods such as e-mail and sms or traditional ones such as operator telephone contact, in full compliance with the principles of legality and correctness and also with applicable provisions of law in force).

For personal data that relates to the execution/implementation of the contract to which the data subject is a party, or to the fulfilment of a regulatory obligation (e.g. compliance obligations related to the keeping of accounting and tax records), the failure to provide personal data will make it impossible for the contractual relationship to be entered into.

The data provision is, however, optional for data processing operations that are preliminary to the transmission of information messages and commercial and promotional communications related to the Data Controller's activity, products and services.

Data processing methods

The Data Controller, or persons specially delegated by the latter, is/are responsible for gathering and subsequently processing data at the Company's registered office, in compliance with the provisions of the GDPR 679/2016, and the data processing operations are either automated (on electronic or magnetic media) or non-automated (paper media).

All data processing operations are implemented according to procedures and methods that guarantee the integrity, confidentiality and availability of personal data.

Communication and dissemination of data

The Company may communicate data subjects' personal data to outside parties operating as data controllers e.g. banks and credit institutions, insurance companies, independent professional offices (law firms, notaries' offices, commercial law/business consultancies), supervisory and regulatory authorities and bodies and, in general, to public and private persons or entities that are entitled to request personal data.

Personal data may be processed on the Data Controller's behalf by external parties designated as external data processors, who carry out specific activities for the Data Controller e.g. companies that handle compliance requirements in the fields of law, accountancy, tax and insurance, management of receipts and payments, and companies that handle the shipment of correspondence.

Company employees may process personal data for the purposes indicated above if they have been formally authorised to carry out data processing operations, and have received proper operational instructions for this purpose.

Personal data will be stored at the Company's headquarters and on servers located in Via A. Pacinotti 21-33080 Porcia.

Personal data will not be transferred outside the European Union.

Data retention period

Personal data provided will be stored in the Company's archives for the term of the contract and, thereafter, in order to implement any compliance obligations associated with and resulting from the contract entered into, and only for as long as the Company is subject to data storage obligations for tax purposes or for other purposes provided for by applicable legislative or regulatory provisions.

Rights of the data subject

The data subject may, at any time, exercise (without special formalities) his/her rights against the Data Controller or the Data Protection Officer (DPO), in accordance with Articles 15 to 22 of the GDPR 679/2016. More specifically, the data subject has the following rights: to have access to his/her data (Article 15), to ask for the data to be corrected, updated, supplemented (Article 16) or erased (Article 17), to limit their use by the Data Controller (Article 18), to obtain a copy thereof in a commonly used structured format that is readable by an automatic device (Article 20), to challenge the data processing if the relevant conditions are satisfied (Article 21 and 22). These rights and entitlements are exercisable to the extent that the data processing is not required by applicable legislative or regulatory provisions or rules. Requests by the data subject to exercise his/her rights may be addressed to the Data Controller by email, to tuper@tuper.info

If the data subject is not satisfied by the response to the request, he/she may file a complaint with the Italian Data Protection Authority www.garanteprivacy.it.

Citizens of different EU member states may contact the supervisory authority of their own country.

Data Controller

The Data Controller - whom you may contact in order to assert your rights pursuant to Articles 15 to 22 of the DGPR 679/2016 and to applicable domestic rules in force - is Tuper S.r.l., represented by the legal representative *Perin Celestino*, with registered office in 33080 Porcia (PN) Via Pacinotti 21 - tax code and VAT No.: IT 01579910934.

The list of data processors is available on request at the company secretary's office.

Porcia, 04/03/2020

TUPER S.R.L.
Via Pacinotti 21 - 33080 PORCIA (PN)
Ccd. Fisc. e Partita IVA 01579910934
Tel. (0434) 920838 - Fax (0434) 922484
Mail: tuper@tuper.info

The undersigned _____ tax code: _____ as

consents to the Company carrying out the activities described above, for which consent constitutes the legal basis of the data processing and, accordingly,

☐ Consents

☐ Does not consent

Place and date

Signature _____

IN RECEIPT OF THE DATA PRIVACY NOTICE

I the undersigned _____
as _____

ATTACH ID DOCUMENT

hereby acknowledge receipt of the privacy notice.

Place and Date _____

Signature _____