



DATA PRIVACY NOTICE AND CONSENT REQUEST FOR CUSTOMERS AND SUPPLIERS

pursuant to and for the purposes of Articles 6 and 13 of Regulation 2016/679/EU of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

This notice is provided to inform you of the processing of your personal data, in compliance with the aforementioned legislation and based on principles of correctness, lawfulness and transparency, protecting your privacy and your rights.

1. **IDENTITY AND CONTACT DATA OF THE DATA CONTROLLER:** the data controller is **CP PROJECT SNC DI BERETTA E PANIGARA**, based in VIA DELL'ARTIGIANATO 78 - MONTICHIARI (BS) - Tax code and VAT reg. number: 00946280179 - 00590210985 and e-mail address amministrazione@cp-project.com;
2. **CATEGORIES OF DATA:** the personal data of natural persons processed by **CP PROJECT SNC DI BERETTA E PANIGARA** belong exclusively to categories other than the so-called "special categories" (see article 9 of GDPR) such as personal details, telephone and e-mail contact details, bank details. If the person providing the data is under the age of 14, the relative consent must be given or authorised by a person with parental responsibility, in relation to which the identification data and a copy of the identification documents are acquired.
3. **PURPOSE OF and LEGAL BASIS FOR THE PROCESSING:** your personal data will be processed for the following purposes:
 - a) the fulfilment of mandatory administrative, accounting, statutory and fiscal requirements relating to the data subject;
 - b) the administrative and commercial management of the contractual relationship; the management and execution of the contracts stipulated with the data subject, including the services necessary to ensure supplies, post-sales assistance and warranties;
 - c) fulfilment of specific requests from the data subject;
 - d) the possibility of being included in the references and case histories on the website and on the social networks belonging to the data controller;
 - e) the possibility of being photographed/filmed at fairs, events etc. and/or at the stand or offices of the data controller, with photos and videos that can be published on the web and social networks.

The processing referred to in points a), b) and c) is necessary to carry out the specific request from the data subject, while the processing referred to in points d) and e) requires the explicit consent of the data subject. It should be noted that any promotional activities are intended to collect and use data, nevertheless within the scope of the activities of **CP PROJECT SNC DI BERETTA E PANIGARA**, in order to produce studies, research and/or market statistics and/or send out informative material, commercial information and/or interactive commercial communications.

4. **DATA SOURCE:** the personal data of the data subject are collected at the premises of the data controller, or during fairs, events, conferences or meetings, also at the premises of the data subject, by employees of **CP PROJECT SNC DI BERETTA E PANIGARA** or via specific collection forms on the website, in order for the company to carry out its own activities, as specified in point 3 above.
5. **PROCESSING METHODS:** processing may take place using manual and/or automated systems designed to memorise, manage and transmit the data, with logics strictly related to the purposes themselves, on the basis of the data communicated by the data subject and with a commitment by the same to promptly inform the data controller of any corrections, additions and/or updates. These data will be managed and protected in environments and on devices whose access is constantly under the control of the data controller. In particular, the information systems and computer programs used by the data controller are configured in such a way as to minimise the processing of personal data as far as possible (always within the scope of the aforementioned purposes). The data are stored in such a way as to minimise the risk of destruction or loss, of unauthorised access and of processing that is not permitted or is incompatible with the purposes set out above.
6. **DATA STORAGE:** the data collected and processed will be kept for a period of time not exceeding the achievement of the purposes for which they are processed ("storage limitation principle", article 5 GDPR) or on the basis of the deadlines established by law (with explicit reference to article 2220 of the Italian Civil Code). For the purposes indicated in points 3a), 3b) and 3c), the storage time is that necessary for the fulfilment of the contractual obligations and, in any case, no more than 10 years for the fulfilment of legal obligations and, in any case, no later than the terms established by law for the limitation of rights; for the purposes referred to in points 3d) and 3e) for 36 months from when consent to processing is provided or updated.
7. **RECIPIENTS OF PERSONAL DATA:** as part of the stated purposes, the data of the data subject may be communicated:
 - a) to data processing centres and/or service companies, including electronic data processing and software and IT consulting services, external to the data controller's organisation but still closely related for operational purposes; to credit and/or financial companies, to subjects



responsible for the transport and/or delivery service; to subjects in charge of managing correspondence;

- b) to tax consultants, to the employment consultant, to the client's legal representative, to other subjects appointed by **CP PROJECT SNC DI BERETTA E PANIGARA** to carry out matters entrusted to them or subjects in charge of debt collection;
- c) to public and private bodies, also following inspections or checks or for the fulfilment of obligations deriving from the law or from mandatory regulations, from EU law or from secondary regulations (such as Financial Administration, Tax Police bodies, Judicial Authorities, Labour Inspectorate, Temporary Associations (ATS), Social Security Institutions, Chamber of Commerce etc.); to subjects that can access your data by virtue of laws or secondary or EU legislation;
- d) to other subjects, external to the organisation of **CP PROJECT SNC DI BERETTA E PANIGARA** who deal, on its behalf, with technical assistance and warranty activities.

The scope of data communication is functionally and closely related to what is necessary for the completion of the supply and/or the provision of services. Subjects belonging to the aforementioned categories could perform the role of Data Processor, or operate in total autonomy as outsourced Data Controllers. The list of designated Data Processors is constantly updated and available at the registered office of **CP PROJECT SNC DI BERETTA E PANIGARA**. Data subjects can therefore request this list by contacting the data controller through the channels indicated in point 1 of this notice.

8. **DISSEMINATION**: it is not possible to disseminate personal data, with the exception of the web and social media side (see article 3).
9. **PROVISION**: consent from the data subject to **CP PROJECT SNC DI BERETTA E PANIGARA** is not necessary if there is a contract between the parties or in order to carry out pre-contractual measures adopted at the request of the data subject: by virtue of article 6, paragraph 1b) such data will be processed without any need for consent, in the case of data functional to these obligations, as indicated in points 3a), 3b) and 3c). For any further purposes referred to in points 3d) and 3e), on the other hand, it is possible to freely express consent, according to the CON-CF form on the following page. If the data subject refuses to provide data or allow their processing, it may become impossible to carry out the activities themselves.
10. **DATA TRANSFER**: the personal data provided will not be transferred outside the European Union.
11. **REFERENCES**: we inform you that, for any clarification regarding these topics, you can contact the data controller, also in the event of uncertainty as to the nature of a data and the way in which it is to be processed, contacting Ms Evelin Bettini. The company references are shown on the website <http://areadownload.net/cpstampi/privacypolicy.pdf/> in addition to in point 1 of this notice.
12. **DATA SUBJECT RIGHTS**: the data subject may, at any time, exercise the rights listed below:
 - a) access to personal data: obtain confirmation as to whether or not personal data concerning him or her are being processed and, where that is the case, access to the following information: the purposes of the processing; the categories of personal data concerned; the recipients, the storage period, the right to lodge a complaint with a supervisory authority, the right to request the rectification, erasure or restriction of processing of personal data or to object to such processing;
 - b) to request the rectification or erasure of the personal data or the restriction of their processing; restriction means the marking of stored data with the aim of restricting its processing in the future;
 - c) opposition to processing: to oppose, in whole or in part, for reasons related to the specific situation of the data subject, the processing of his/her personal data, even where pertaining to the purpose of collection;
 - d) data portability: in the case of automated processing carried out on the basis of consent or during the execution of a contract, to receive the data concerning him or her in a structured, commonly used and machine-readable format;
 - e) revocation of the consent to the processing for purposes referred to in points 3d) and 3e); exercising this right in no way prejudices the lawfulness of the processing carried out before the revocation;
 - f) to lodge a complaint with the supervisory authority (for Italy this is the Garante Privacy) which can be contacted using the contact details shown on the website www.garanteprivacy.it.

The aforementioned rights may be exercised by sending a request to the data controller via the contact channels indicated in article 1 of this notice, also using the appropriate forms available on the company website at the link indicated above in point 11. Requests relating to exercising user rights will be processed without delay and, in any case, within one month of the request.

13. **CHANGES TO THIS NOTICE**: this notice may be subject to change. We therefore recommend that you check this notice regularly and refer to the latest version.



To express consent, only in cases not included in article 6 paragraph 1b), please send an e-mail to CP PROJECT SNC DI BERETTA E PANIGARA at amministrazione@cp-project.com

DATA SUBJECT CONSENT TO PERSONAL DATA PROCESSING

Fully informed pursuant to article 13 of Regulation 2016/679/EU, according to form INF-CF provided, I the undersigned:	
Surname and First Name:	
representing:	
Address:	City:
pursuant to article 7 of the same Regulation, within the limits identified in form INF-CF received, opt for the following preferences, in specific form, freely and in writing, signing at the bottom of the page to show acceptance:	

CONSENT

<u>WEBSITE REFERENCES:</u>
as regards the processing of the data referred to in point 3e) in this notice, as explained in article 3 itself:
<input type="checkbox"/> I give my consent <input type="checkbox"/> I do not give my consent

<u>USE OF IMAGES AND AUDIO:</u>
as regards the processing of the data referred to in point 3f) in this notice, as explained in article 3 itself:
<input type="checkbox"/> I give my consent <input type="checkbox"/> I do not give my consent

I also reiterate my commitment to promptly notify you of any corrections, changes and/or additions to the data in your possession.

Place and date Data subject signature