

## **Guidelines on the processing of personal data pursuant to art. 13-14 EU Reg. 2016/679**

The Parties involved: customers and potential customers.

Robino & Galandrino S.p.A. as Data Controller of your personal data, pursuant to and in accordance with the EU Regulation 2016/679 hereafter 'GDPR', hereby informs you that the mentioned regulation includes the protection of the parties involved regarding the processing of personal data and that this processing will be based on principles of correctness, lawfulness, transparency and protection of Your privacy and Your rights.

Your personal data will be processed in accordance with the legislative provisions of the aforementioned regulation and the confidentiality obligations therein.

### **Purposes of processing:**

- Your data will be particularly processed for the following purposes related to the fulfillment of legislative or contractual obligations;
- to provide information about future business of new products, services, offers and events, both on our part and on behalf of affiliate and / or subsidiaries and commercial partners.

The processing of functional data for the fulfillment of these obligations is necessary for a proper management of the relationship and their conferment is mandatory to implement the purposes indicated above. The Data Controller also states that any non-communication, or incorrect communication, of mandatory information, might prevent the Data Controller from guaranteeing the adequacy of the processing.

Method of processing data, Your personal data may be processed in the following ways:

- processing of data collected by third parties;
- data collection through cards, files, folders, business cards and questionnaires;
- processing by electronic calculators.

Each data processing takes place in accordance with the articles. 6, 32 of the GDPR and through the proper security measures.

Communication: your data will be communicated exclusively to competent and duly appointed persons for the necessary services aiming to manage the relationship, with guaranteed protection of the rights of the interested parties.

Your data will be processed only by personnel expressly authorized by the Data Controller and, particularly, by the following categories of employees:

- marketing office;
- commercial office;
- administrative offices;
- IT office;
- legal office;
- management.

Circulation: Your personal data will not be disclosed in any way.

Your personal data may also be transferred, in accordance with the purposes indicated above and with the guarantees, requested from time to time, in the following states:

- EU and non-EU countries.

Storage term. Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 of the GDPR, the storage term of your personal data is:

- established for a period of time not exceeding the services provided.

Data Controller: the Data Controller, pursuant to the Law, is Robino & Galandrino S.P.A. - based in Alessandria (AL), Corso Virginia Marini 103 - tel. +39 0141821411 - fax +39 0141832539 - mail sales@robinoegalandrino.it and VAT No. 01878780061 - in the person of the CEO pro tempore.

You have the right to obtain from the Data Controller the cancellation (right to be forgotten), limitation, updating, correction, portability, opposition to the processing of personal data concerning You, as well as the possibility to exercise all rights provided in articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

#### **EU Reg. 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the interested party**

- 1. The interested party has the right to obtain confirmation of the existence or not of personal data concerning him / her, even if not recorded yet, and their communication in comprehensible form.
- 2. The interested party has the right to be supplied with:
  - a.the origin of personal data;
  - b.the purposes and methods of processing data;
  - c.the method applied in case of processing data with the aid of electronic instruments;
  - d.the identifying details of the Data Controller, of the managers and of the designated assistant in accordance with article 5, paragraph 2;
  - e.the parties or licensee to whom personal data may be communicated or that can gain Knowledge, as appointed representative of the Country, of managers or assistants.
- 3. The interested party has the right to be supplied with:
  - a. updating, correction or, when needed, addition to the data;
  - b. cancellation, "blind" conversion or data block processed in breaching of law, including data whose storage is not necessary for the purposes the data were collected for or subsequently processed;
  - c. certification that operations as per in letters a) and b) have been brought to the attention of, also regarding their content, of those to whom the data have been communicated or circulated, except in case this fulfillment is impossible or involves a use of means manifestly disproportionate to the protected right;
  - d.data portability.
- 4. The interested party has the right to resist, wholly or in part:
  - a. to the processing of personal data, by legitimate reasons, concerning him, even if relevant to the purpose of the data collection;
  - b. to the processing of personal data related to him for the purpose of sending advertising or direct sales material or for market researches or commercial communication.

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