

## PRIVACY DISCLOSURE EX ART. 13-14 EU REGULATION 2016/679

### 1. Who your personal data will be processed by.

The company which will process the data of the interested party is **Industria Termoplastica Pavese S.p.A** with its registered office in Via Cavallante 13, 27040, Bosnasco (PV) Italy – Mail: [privacy@itp.it](mailto:privacy@itp.it) (hereafter the **Data Controller**)

### 2. The main purpose of the use of Personal Data.

Personal data will be processed for the purpose of the correct management of the contractual relationship/ provision of the service (request for information) and where provided, the related obligations (administrative, management, compliance with legal, accounting, tax and any other obligations however connected to the above purposes).

The personal data collected for this purpose will be used by the Data Controller for the purpose of responding to the request received for any other related subsequent communication.

The provision of data is optional, however any refusal to provide it will make it impossible for the Data Controller to contact the interested party through his Customer Care function.

### 3. Further purposes.

The Data Controller can process the data for **direct marketing purposes** or if the Data Controller wishes to carry out promotional and marketing activities towards the interested party through sending out newsletters and commercial communication related to new products.

Marketing actions can be managed either through c.d. mode traditional (e.g. paper mail, telephone calls with an operator, etc.) automated and /or assimilated to them / e.g., e-mail)

### 4. Ways of collecting Personal Data.

The processing of the interested party's data:

- a. will take place in full compliance with the principles of confidentiality, correctness, necessity, relevance, lawfulness, and transparency in order to guarantee the security and confidentiality of data through the adoption of the measures provided for in Article 32 of the Regulation in order to preserve the integrity of the processed data and prevent access by unauthorised persons.
- b. will be carried out by personnel in charge who are specialized in the use of paper, IT, electronic tools and with any type of support considered to be technologically suitable.

### 5. The categories of personal data collected.

The use of the site by visitors, for technical, security and statistical reasons involves the collection and processing of different types of personal data relating to the user:

#### a) Navigation data

The computer systems and software procedures proposed for the operation of our site acquire certain personal data during their normal operation whose transmission is implicit in the use of Internet communication protocol. This information is not collected in order to be associated with identified parties, but which by their very nature could allow you to identify users through processing and associations with data taken from third parties. This category of data includes the IP addresses or domain names of the computers used by users who connect to our site.

#### b) User's willingly given data

The collection of users' personal data can take place in a voluntary way, through the sending of e-mails to the addresses reported on the site or through dedicated forms present on the same by the users. The sending of e-mails involves the Data Controller collecting the senders' addresses in order to respond to the request as well as any other personal data contained in subsequent communication.

## 6. Eventual communication of Personal Data.

The interested party's Personal Data can be communicated to specific subjects considered to be recipients under and for the effects of the Art. 4 point 9 of the Regulation.

In particular, in order to carry out the processing and pursue the purpose described above properly, personal data may also be processed by the following recipients:

- Third parties who take part in the processing activities and/or activities related to them on behalf of the Data Controller. Before processing these subjects will be appointed as processing managers.
- Employees, collaborators or single consultants for the Data Controller who have been entrusted with specific activities of processing Personal Data and as such identified by the rules of art. Point 4, "Authorised Persons",
- Judicial authorities or public bodies, where required by law.

The data will not be disseminated.

## 7. Place of processing and possible transfer outside the EU

Personal Data will be processed by the Data Controller within the territory of the European Union. Where it is necessary to use persons outside the EU for technical and/or operational matters, the Data Controller will appoint them as processing managers, pursuant to and for the effects of art. 28 of the Regulation, ensuring from now on that any transfer of extra- EU data will take place in accordance with the applicable legal provisions.

To protect your data as part of these transfers, **Industria Termoplastica Pavese S.p.A.** will adopt appropriate guarantees, including adequacy decisions and standard contractual clauses approved by the European Commission.

## 8. The retention and deletion of data.

The interested party's personal data will be retained by the Data Controller and limited to what is necessary for the pursuit of the purpose described in point 3 above, i.e. until the termination of the relationship with the Data Controller without prejudice to a further retention period that may be imposed by legal regulations.

With regards to the processing carried out for the purposes described in point 4 above, the Data Controller may process the interested party's personal data until such time as the same communicates the will to withdraw consent for one or all of the purposes for which it has been requested.

## 9. The rights of the interested party.

The interested party can exercise his/her rights at any time provided for from art. 15 to 22 EU Regulations 2016/679 including:

- a. Receive confirmation of the existence of your Personal Data, know the purpose of the processing or the scope of circulation and access the content.
- b. Updates modify and/or correct your Personal Data.
- c. Request the deletion, the transformation into an anonymous form, the blocking of any data processed in violation of the law or the limitation of the processing.
- d. Legitimate reasons to object to the processing of data, including profiling.
- e. Object to the processing of data for the purpose of sending advertising material, direct sales or for the purpose of carrying out market research or commercial communication.
- f. Revoke consent, where given, without prejudice to the lawfulness of the consent – based processing given prior to revocation.
- g. Receive a copy of the data provided and ask that such data be transmitted to another Data Controller.

It should be emphasised that the interested party's right of opposition to the processing of the personal data for commercial and marketing purposes carried out through automated contact methods extends also to traditional ones, while remaining without prejudice of the possibility for the subject of the data to exercise this right in part or, in this case by considering, for example, only the sending of promotional communications made through automated devices.

To exercise the rights, it is enough to contact the Data Controller in the following ways:

- Writing to Industria Termoplastica Pavese S.p.A. registered office in Via Cavallante 13, 27040, Bosnasco (PV), Italy
- Sending an e-mail to [privacy@itp.it](mailto:privacy@itp.it)

#### **10. How to revoke content**

It is always possible to revoke content by sending written communication to the Data Controller and **Industria Termoplastica Pavese S.p.A.** with its registered office in Via Cavallante 13, 27040, Bosnasco (PV), Italy - Mail [privacy@itp.it](mailto:privacy@itp.it)

If the person concerned finds a violation of his rights, they can contact the competent supervisory pursuant to art. 77 of the GDPR, it remains without prejudice for the possibility of contacting the judicial authority directly.

#### **11. Contacts**

The Data Controller and **Industria Termoplastica Pavese S.p.A** with its registered office in Via Cavallante 13, 27040, Bosnasco (PV), Italy – Mail [privacy@itp.it](mailto:privacy@itp.it). The list of managers and Data Controllers is kept at the owner's premises.

This policy may be subject to change. For each update, please consult the website and other channels made available by the **Industria Termoplastica Pavese S.p.A.**

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