

CLIENT PRIVACY NOTICE

pursuant to Article 13 of Regulation (EU) 2016/679 of 27 April 2016
General Data Protection Regulation

This notice provides a concise description of the methods and purposes of the processing of your personal data by our company Ormesani S.r.l. Società benefit, as Data Controller (hereinafter also the “Controller”), as well as any further information required under applicable personal-data-protection legislation. Processing shall take place in compliance with Regulation (EU) 2016/679, the General Data Protection Regulation (hereinafter the “Regulation”).

The Regulation provides that “Personal Data” means any information relating to an identified or identifiable natural person (hereinafter the “Data Subject”). “Processing” means any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Pursuant to Articles 12 et seq. of the Regulation, we provide you with the following information on the processing of your Personal Data.

1. DATA CONTROLLER

The Data Controller is Ormesani S.r.l. Società benefit, with registered office in Quarto d'Altino, Via G. Pascoli 42/N, Tax Code and VAT No. 02061320277.

2. PURPOSES AND LEGAL BASIS OF PROCESSING

The processing of your personal data (for example name, surname, personal contact details, address, bank and payment details) is intended for:

- performance of activities strictly connected with establishing contractual relationships, including acquisition of preliminary information before conclusion of a contract;
- performance of obligations and exercise of rights arising from the contract (including payment, exchange of information, administration and management of orders, shipments, invoicing and any disputes);
- compliance with obligations imposed by laws, regulations or EU legislation, including tax or accounting obligations, relating to the contractual relationship between the Controller and the Data Subject;
- sending promotional messages by e-mail, provided that they concern products and/or services similar to those already purchased, without prejudice to the right to object at any time to receiving the above communications;
- subject to specific consent, sending commercial and/or promotional communications concerning the Controller's products and/or services. Such processing includes marketing and advertising communications carried out by automated contact methods (for example e-mail, SMS) and traditional methods (for example sending brochures by post), as well as market research and statistical surveys;
- subject to specific consent, sending commercial and/or promotional communications concerning services, events and products of other companies connected with or affiliated to the Data Controller. Such processing includes transmission of personal data to partner companies (for example other Group companies) for marketing and advertising purposes carried out by automated contact methods (for example e-mail, SMS) and traditional methods (for example operator-assisted telephone calls or sending brochures), as well as market research and statistical surveys.

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Fiumicino 00054,
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Civitavecchia 00053,
Roma - Italia

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Segrate 20054,
Milano-Italia

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America Corporation**

221 River St
9th Floor
Hoboken NJ 07030,
Stati Uniti d'America

Provision of data for the purposes under letters a) and b) is optional, but refusal to provide them or allow their processing shall make it impossible for the Controller to establish and properly perform the contractual relationship. Processing of personal data for the purpose under letter c) is mandatory, and refusal to provide them shall make it impossible for the Controller to comply with obligations connected with the contractual relationship and therefore to establish and perform that relationship. Provision of personal data for the purposes under letters d), e) and f) is optional, and refusal to provide them shall make it impossible for the Controller to use them for transmission of the above communications.

Personal data may be processed for the purposes under letters a), b) and c) without consent, pursuant to Article 6(1)(b) and (c) of the Regulation. Processing for the purpose under letter d) is permitted pursuant to Italian Data Protection Authority Resolution No. 330 of 4 July 2013. The legal basis for processing under letters e) and f) shall be your consent, if given, which may always be freely withdrawn (including with reference to only one of those processing purposes) by sending a communication to privacy@ormesani.it. The personal data you provide may include data concerning natural persons working on your behalf, as employees or on a self-employed basis (e.g. name, surname, business e-mail address, telephone number, corporate role). The Controller undertakes not to process such data for purposes other than those indicated above, in accordance with the Regulation and the methods described in this notice.

3. METHODS OF PROCESSING

Personal data are processed with the aid of paper, telematic or IT tools, using organisational and processing logic strictly related to the purposes stated above and, in any event, in a manner that guarantees their security, integrity and confidentiality.

Specific security measures are observed to prevent loss of data, unlawful or improper use and unauthorised access.

4. DATA RETENTION PERIOD

Personal data shall be retained for the time strictly necessary to achieve the purposes for which they were collected and processed. With reference to the purposes under letters a), b) and c) of paragraph 2, personal data shall be retained solely for performance of operations instrumental to establishing, managing and fulfilling contractual relationships. For the purpose under letter d) of paragraph 2, personal data shall be processed until the Data Subject exercises the right to object, while for the purposes under letters e) and f), personal data shall be processed until consent is withdrawn and in any event for a maximum period of 24 months. It remains understood that, once the purposes of processing have been exhausted and/or in the event of exercise of the right to object or withdrawal of consent, the Controller shall nevertheless be required and/or entitled to retain your personal data for the periods prescribed by law and/or in order to establish or defend a legal claim.

5. DISCLOSURE OF PERSONAL DATA

Your personal data shall not be disseminated. However, within the purposes indicated above, your personal data shall be accessible (limited to the respective area of competence) to persons authorised to process data for the Controller and may be disclosed to third parties such as Public Authorities (e.g. Customs and Monopolies Agency, Port System Authority, etc.) and external collaborators of the Controller (e.g. legal, tax and IT consultants). Other companies connected with or affiliated to the Data Controller (for example Group companies) may also have access to personal data for organisational reasons relating to the purposes under paragraph 2. Where necessary, the Controller has appointed recipients of your data as external Processors pursuant to Article 28 of the Regulation.



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6. TRANSFER OF DATA ABROAD

Your personal data may be transferred to countries outside the European Union within the purposes under paragraph 2. If personal data are transferred outside the European Union in the absence of an adequacy decision by the European Commission, the requirements of applicable legislation concerning transfers of personal data to non-EU third countries shall in any event be observed.

7. RIGHTS OF THE DATA SUBJECT

At any time, the Data Subject may exercise the rights under Articles 15 to 22 of the Regulation, including, in summary, obtaining from the Controller confirmation as to whether or not personal data concerning him or her are being processed and, where that is the case, obtaining access to the data and information concerning their source, the purposes and methods of processing, the recipients or categories of recipients to whom personal data may be disclosed, and the retention period; exercising the right to obtain rectification, updating or completion of data from the Controller; the right to erasure or anonymisation of data or restriction of processing of personal data concerning the Data Subject; the right to be informed of any rectification or erasure of data or restriction of processing carried out in relation to his/her personal data; the right to object at any time to processing of the data; and the right to receive personal data in a structured, commonly used and machine-readable format.

Applicable legislation recognises the Data Subject's right to lodge a complaint with the Italian Data Protection Authority or other competent supervisory authority where the relevant conditions are met.

To exercise his/her rights, the Data Subject may contact the Controller at the following details:

- e-mail: privacy@ormesani.it
- address: Via G. Pascoli, 42/N - 30020 Quarto d'Altino (VE)
- fax: +39 041 2695600

8. CONSENT TO THE PROCESSING OF PERSONAL DATA

The undersigned, _____, having read and understood this notice:

- ☐ Accepts
☐ Does not accept

to receive commercial and/or promotional communications concerning the Controller's services, events and products. Such processing includes marketing and advertising communications carried out by automated contact methods (for example e-mail, SMS) and traditional methods (for example sending brochures by post), as well as market research and statistical surveys.

9. CONSENT TO THE PROCESSING OF PERSONAL DATA

10. The undersigned, _____, having read and understood this notice:

11. ☐ Accepts
 12. ☐ Does not accept

13. to receive commercial and/or promotional communications concerning services, events and products of other companies connected with or affiliated to the Data Controller. Such processing includes transmission of personal data to partner companies (for example other Group companies) for marketing and advertising purposes carried out by automated contact methods (for example e-mail, SMS) and traditional methods (for example operator-assisted telephone calls or sending brochures), as well as market research and statistical surveys.

Luogo e data _____

Timbro e Firma _____

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