

## PRIVACY POLICY

(Artt. 13-14 EU Regulation 2016/679 and Legislative Decree 196/2003 and subsequent amendments)

Dear data subject,

below, we provide you with some information that is necessary to bring to your attention, not only to comply with legal obligations but also because transparency and fairness towards data subjects are fundamental aspects of our business.

### Data controller

The Data Controller for your personal data is **Alberdingk Italia S.r.l.**, who is responsible for the legitimate and proper use of your personal data. You can contact them for any information or requests using the following contact details:

VAT number	05123500265
Address	Viale Giuseppe Verdi, 23/E, Scala B, int. 301 - 31100 TREVISO (TV)
Phone	+39 0422 1490328
PEC - mail	alberdingkitalia@legalmail.it - amministrazione@alberdingkitalia.com

### Categories of processed data and data source

For the processing, the Data Controller will process common data, such as: personal data, contact information, address data, data related to identification/recognition documents, payment data, access, and identification data.

The data are provided by you and/or by third parties such as other suppliers and/or collected from sources accessible to the public.

### Processing

Your personal data is collected and processed through automated, semi-automated and non-automated methods, as specified below:

Processing	Purposes	Legal basis	Data retention*
Front office	Monitoring individuals entering the company; Call filtering	Pursuit of the legitimate interest of the Data Controller in safeguarding corporate assets/ensuring worker safety/for organizational and productive needs	1 year from the year of data acquisition
Logistics	Acceptance and dispatch of documents and goods	Execution of the contract or pre-contractual measures	10 years from the year of competence or from the termination of the last contract

#### Alberdingk Italia Srl

Sede Legale: Viale Giuseppe Verdi 23/E | 31100 Treviso | Italia | Tel +39 0422 1490326 | info@alberdingkitalia.com | www.alberdingk-bolely.de

Management: Thomas Hackenberg (Vice Presidente), Mattia Stefani (Presidente)

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Supplier Management	Establishment and management of the contractual relationship	Execution of the contract or pre-contractual measures; Compliance with a legal obligation	10 years from the year of termination of the last contract
Accounting	Maintenance of accounting records; Tax compliance	Compliance with a legal obligation	10 years from the relevant year
Activity Planning and Control	Activity planning	Pursuit of the Data Controller's legitimate interest in carrying out business activities	10 years from the year of data acquisition
Purchases	Purchase of goods or services	Execution of the contract or pre-contractual measures	10 years from the relevant year
Management Control	Internal management control of the company	Pursuing the legitimate interest of the Data Controller in verifying business activities	10 years from the relevant year
Quality Planning and Control	Verifying procedures and quality standards	Art. 6, paragraph. 1, letter f): Pursuit of the legitimate interest of the Data Controller in the control and efficiency of the Organization	10 years from the year of data acquisition
Management and Maintenance of IT Systems	Management and maintenance of the network and information systems	Pursuing the legitimate interest of the Data Controller; Compliance with a legal obligation (limited to what is required by regulations regarding system administrators)	2 years from the year of termination of the contractual relationship for accounts, passwords, and usernames; 18 months for compliance related to system administrators
Defense of Interests and Rights of the Data Controller	Preventing and/or detecting possible abuses and defending the rights and interests of the data controller	Pursuing the legitimate interest of the Data Controller in protecting its rights and interests in legal proceedings or in the preliminary stages of their possible initiation	Data will be retained as long as the Data Controller or a third party has an interest in exercising their right or interest
Management of Compliance with Personal Data Protection	Managing compliance with personal data protection requirements	Compliance with a legal obligation	For the time strictly necessary to achieve the purpose

\* In addition to the time required for the expiration of the statute of limitations in relation to mutual rights and the backup retention period.

**Data provision**

For the purposes mentioned above, the provision of your data is a necessary requirement; failure to provide the data may make it impossible to carry out the processing.

**Recipients of Data**

Your data may be disclosed exclusively for technical and operational needs strictly related to the aforementioned purposes, to individuals processing data under the authority of the data controller, appointed as authorized processors pursuant to Art. 29 of EU Regulation 2016/679, to individuals processing data on behalf of the data controller, appointed as data processors pursuant to Art. 28 of EU Regulation 2016/679, as well as to public entities for whom there is a legal obligation to communicate.

**Data transfer outside the EU**

The processing of personal data (e.g., storage, archiving, and data retention on servers or in the cloud) will be limited to the circulation and processing areas of personal data within the countries belonging to the European Union. There is an explicit prohibition on transferring data to non-EU countries that do not ensure (or in the absence of) an adequate level of protection, or in the absence of protective measures provided by EU Regulation 2016/679 (a third country deemed adequate by the European Commission, group Binding Corporate Rules, standard contractual clauses, data subject consent, etc.).

**Rights of the data subject**

- You have the right, as provided by Articles 15 and following of EU Regulation 2016/679, to request from the Data Controller access to your personal data, as well as their rectification, erasure, or the right to be forgotten.
- You also have the right to request data portability or the restriction of processing;
- For reasons related to your specific situation, you have the right to object to the processing based on the legitimate interest of personal data concerning you;
- For processing based on consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- You can also lodge a complaint with the Data Protection Authority, located at Piazza Venezia 11, 00187 – Rome – [protocol@pec.gdpd.it](mailto:protocol@pec.gdpd.it).

To exercise your rights or to request additional information, you can contact the Data Controller using the contact information provided above.

**Changes to this Privacy Policy**

We reserve the right to update our Privacy Policy. Changes will be communicated in the most appropriate manner, and we will update the date in this Privacy Policy. Therefore, we recommend periodic review of our Privacy Policy, also by requesting a copy from the Data Controller.

Last updated 12/04/2024