

PRIVACY POLICY

The company **3F Ingranaggi S.r.l.**, with registered office in Via Terrenato, 4-36010 Carrè (VI), in the capacity as data controller (hereafter, "Controller "), informs you as per art. 13 European Union Regulation No. 2016/679 (hereafter "**GDPR**") that your personal data will be handled and used for the following purposes:

1. Subject of processing

The Controller handles personal identity data (for example name, surname, company name, address, telephone number, e-mail, bank and payment details - henceforth "**personal data**" or simply "**data**") provided by you when defining the contract for the Controller's products or services.

2. Purpose of processing

Your personal data is handled:

A) in accordance with Art. 6, chap. b) and c) of the GDPR, for the following purposes:

- Implementation of the contractual agreement with you, or execution of pre-contractual measures adopted on your request;
- Fulfilment of pre-contractual, contractual and fiscal obligations resulting from existing relationship with you;
- Fulfilment of legal obligations, regulations, EC norms or orders from an authority (such as for example under anti-laundering rules);
- Execution of the Controller's rights, for example the right of defence in court;

We would like to inform you that if you are already one of our customers, we may send you commercial material relating to the Controller's products or services, similar to those already purchased by you from our company in a previous transaction, unless your dissent.

B) Just on your specific consent (GDPR Art. 7), for the following marketing purposes:

- Send you e-mails, post and/or SMS and/or telephone calls, newsletters, marketing communication and/or advertising material on products or services offered by the Controller;
- Send you e-mails, post and/or SMS and/or telephone calls, marketing and/or advertising communications from third parties (for example business partners, insurance companies).

3. Processing methods

The processing of your personal data takes place by operations as per Art. 4, point 2) of the GDPR, such as collection, recording, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, interruption, communication, cancellation and data destruction.

Your personal data is processed both electronically or as a hard copy, whether or not by automated means.

The Controller will process personal data for the period required for the execution of the above mentioned purposes, and in any case for no more than 10 years from the end of the relationship and for no longer than 3 years from the collection of the data for marketing purposes.

4. Access to Data

Your personal data may be made accessible for the purposes detailed in Art. 2 paragraphs A) and B):

- to employees and collaborators of the Controller in Italy and abroad, in so much as authorised parties and/or internal representatives for processing and/or system administrators;
- to third party companies or other subjects (for example, credit brokers, professional studios, consultants, insurance companies providing insurance services, etc.) that carry out outsourcing activities on behalf of the Controller, in their role as external processing managers.

5. Communication of data

Without the need for express consent (as per Art. 6 par. b) and c) of GDPR), the Controller may communicate your data for the purposes indicated in Art. 2 A) to security organisations, judicial authorities, insurance companies providing insurance services, as well as subjects to which communication is required by law for the completion of the aforementioned purposes. These subjects will process the data autonomously as data Controllers.

Your data will not be spread.

6. Transfer of data

Personal data is stored on a server located in Carré /Vicenza (Italy), inside the European Union. It is understood that the Controller, if necessary, reserves the right to move data outside of the European Union. In that case, the Controller guarantees that the transfer of data outside of the European Union will be in compliance with applicable legal requirements, and subject to the adoption of the standard contractual clauses required by the European Commission.

7. Nature of data assignment and consequences of refusal to reply

The assignment of data for the purposes as per Art. 2.A) is mandatory. Without them, we cannot guarantee execution of the contract detailed in Art. 2.A).

The assignment of data for the purposes as per Art. 2.B) is optional. You can decide not to provide any data or refuse consent at a later date for data already provided: in this case you will not receive any newsletters, commercial communications and advertising material relating to the Controller's products and services. Your rights to products and services detailed in Art. 2 A) will remain unchanged.

8. Data Subject's Rights

As an interested party, you have the rights under Art. 15 of the GDPR, specifically the right to:



- i. obtain the confirmation of the existence or not of personal data concerning you , even if still not recorded and their communication in intelligible form;
- ii. obtain information of: a) the source of personal data; b) the purposes and methods of handling; c) the system used in the event of processing by electronic means; d) the identification details of the Controller, of managers and designated representatives as per Art. 3, paragraph 1 of the GDPR; e) the recipients or categories of recipient to whom the personal data have been or will be disclosed as a designated representative in the State's territory, as designated or authorised parties;
- iii. obtain : a) updating, amendment or where interested therein, data integration ; b) cancellation , anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed; c) declaration that the operations as per letters a) and b) have been notified, including to their contents, to the entities to whom or which the data were communicated or spread, unless this requirement results impossible or involves a manifestly disproportionate effort compared to right to protect;
- iv. to oppose, in whole or in part; a) for legitimate reasons the processing of personal data on you, even if relevant to the purpose of its collection; b) the processing of personal data regarding you for sending of advertising material, market research and commercial communication via e-mail and / or traditional methods via the telephone and/or hard copy.

Where applicable, you also have the right under articles 16-21 of the GDPR (Right to amendment, Right to erasure, Right to restriction of processing, Right to data portability, Right to object), as well as the right to complaint to the authorities.

9. Ways of exercising your rights

You may, at any time, exercise your rights by sending:

- A letter by registered mail to the headquarters of the Controller;
- An e-mail to privacy@3fingranaggi.com

10. Controller, responsible and authorised parties

The Controller of processed data is **3F Ingranaggi s.r.l.**, having headquarters in Via Terrenato 4, 36010 Carrè (VI) Italy; contact information is available on the company website **www.3fingranaggi.com**.

The updated list of responsible and authorised parties is stored at the headquarters of the data Controller.