



# PRIVACY NOTICE

## AGENCIES

V. 1.00.01

## DATA CONTROLLER

### ALMECO S.P.A.

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Email: [info.it@almecogroup.com](mailto:info.it@almecogroup.com); [privacy@almecogroup.com](mailto:privacy@almecogroup.com)

PEC certified email: [almeco@registerpec.it](mailto:almeco@registerpec.it)

VAT no. and tax code and ITVAT: 00772590154

Share capital: €30,000,000 fully-paid

Economic and Administrative Index (REA): 687991

Milan Chamber of Commerce

[www.almecogroup.com/it](http://www.almecogroup.com/it)

## PRINCIPLES

One of our fundamental objectives is the protection of personal data.

The data are processed in a lawful, proper and transparent manner, must be adequate, relevant and limited to what is necessary, accurate and, if necessary, updated, collected for specific, explicit and legitimate purposes pursuant to articles 5 and 6 of the EU Data Protection Regulation 2016/679 and based on the provision of consent where needed.

The data are processed in such a way as to ensure their adequate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage (integrity and confidentiality) through appropriate technical and organizational measures.

We notify users in the event of substantial changes to this Privacy Policy and the related data processing, providing the option to authorize us or otherwise to process the data for the purposes set out below.

## SOURCES OF PERSONAL DATA

### Collected from the Data Subject:

Offices of the Data Controller;

Offices of the Data Subject.

### NOT collected from the Data Subject:

Private Databases (Credit Information Systems, etc.);

Public Databases (Telephone Directories, Lists of Members of Orders or Registers, Chambers of Commerce, Other Lists, etc.);

Internet / Search Engines/ Social Networks;

Specialist Trade Journals.

## CATEGORIES OF PERSONAL DATA PROCESSED

### COMMON

Identification and contact data: of legal entities, herein including data relating to the employees and equivalent of the AGENT, images, audio and videos, and accounting, tax and trading data.

### SPECIAL CATEGORY OF PERSONAL DATA

- personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, public and political functions;
- personal data revealing religious or philosophical convictions or membership in religious or philosophical associations or organizations;
- personal data contained in the social security, insurance, tax documentation, revealing the state of health (for example, illness, accident, belonging to a protected category, etc.).

## PURPOSES OF THE PROCESSING

### 1. EXECUTION OF PRE-CONTRACTUAL MEASURES

Description of the purposes and legal basis for the processing: Purposes connected to the establishment of negotiations and the execution of pre-contractual measures.

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Legal Basis for Processing:

Execution of pre-contractual measures;

Legitimate Interest of the Data Controller to get in touch with the contact persons of the AGENT in relation to the required pre-contractual measures.

#### **DURATION OF THE PROCESSING AND STORAGE PERIOD**

Duration and Storage for the period strictly necessary for the proper and complete management of the request/negotiation;

Processing stopped / anonymization at the end of management of the request.

### **2. EXECUTION OF CONTRACTUAL MEASURES.**

#### **Description of the purposes and legal basis for the processing**

Purposes connected to the establishment, fulfilment, execution and termination of the Agency Contract which involves: fulfilment of obligations, including necessary communication to recipients involved in the processing; administration, accounting, contract management, orders, shipment, services, invoicing, complaints, etc.

#### **Legal Basis for Processing:**

Execution of contractual measures;

Legitimate Interest of the Data Controller to get in touch with the contact persons of the Company involved in the contract in relation to the execution, fulfilment and termination of the Contract between the Parties.

With relation to special category of personal data: art. 9 of EU Regulation 2016/679, "Provvedimento recante le prescrizioni relative al trattamento di categorie particolari di dati, ai sensi dell'art. 21 c. 1 d. Lgs. 101/18" (Act containing the provisions relating to the processing of particular categories of data, pursuant to art. 21 c. 1 d. Lgs. 101/18) issued by the Italian Data Protection Authority on 5th June, 2018.

#### **DURATION OF THE PROCESSING AND STORAGE PERIOD**

Duration for the period strictly necessary for the proper and complete management of the establishment, execution and termination of the contractual relationship or assignment.

Longer retention dictated by legal provisions.

### **3. LEGAL OBLIGATIONS.**

#### **DESCRIPTION OF THE PURPOSES AND LEGAL BASIS FOR THE PROCESSING**

Fulfilment of precise obligations envisaged by regulations and applicable European and national laws

Legal Basis for Processing:

Compliance with legal obligations.

With relation to special category of personal data: art. 9 of EU Regulation 2016/679, "Provvedimento recante le prescrizioni relative al trattamento di categorie particolari di dati, ai sensi dell'art. 21 c. 1 d. Lgs. 101/18" (Act containing the provisions relating to the processing of particular categories of data, pursuant to art. 21 c. 1 d. Lgs. 101/18) issued by the Italian Data Protection Authority on 5th June, 2018.

#### **DURATION OF THE PROCESSING AND STORAGE PERIOD**

Duration and Storage dictated by legal provisions.

### **4. DEFENSIVE RIGHTS.**

#### **DESCRIPTION OF THE PURPOSES AND LEGAL BASIS FOR THE PROCESSING**

Assessment, exercise or defence of the rights of the Data Controller in and out of court

Legal Basis for Processing:

Legitimate Interest of the Data Controller.

#### **DURATION OF THE PROCESSING AND STORAGE PERIOD**

Duration of the in- or out-of-court dispute until the claims are time-barred.

## **METHOD OF CONTACT**

### **Traditional:**

Telephone;

Standard mail.

**Automated:**

Fax;  
Text message;  
Chat or messaging systems (WhatsApp and other comparable instant messaging solutions);  
E-mail.

**RECIPIENTS OF THE DATA**

The data may be disclosed and processed by external parties acting as data controllers such as, by way of example:  
Italy:

- a. Authorities and supervisory and control authorities;
- b. Police and judicial authorities;
- c. Central Credit Registers and Bank of Italy information system;
- d. Public and private databases, including Fraud Prevention, Identity Theft, etc.;
- e. Tax records;
- f. Records of dealings with financial operators;
- g. IVASS;
- h. Public and private databases for the prevention of overborrowing;
- i. Public and private databases for the verification of solvency;
- j. Insurance companies;
- k. Banking institutions;
- l. Financial institutions;
- m. Parties that are transferees of a company, of a business unit, of legal relationships that can be identified as a whole or of individual legal relationships (e.g. the transfer of receivables, contracts);
- n. Adjusters and liquidators;
- o. Law firms;
- p. Parties that offer ICT services (Hosting/Data Centre);
- q. Parties that offer professional consulting services, including in associated form;
- r. Other professional insurance intermediaries.

The data may also be processed on behalf of the Company by external parties designated as data processors, to which appropriate operating instructions are given. These parties are essentially included in the following categories:  
Italy:

- s. Parties that carry out control, review and certification activities, including in the interest of customers;
- t. Parties that offer ongoing compliance support services;
- u. Parties that offer IT, ICT, cloud, web and digital marketing services;
- v. Parties that offer paper, digital and alternative storage services;
- w. Parties that offer traditional and automated postal services;
- x. Parties that offer support in preparing market studies;
- y. Companies or consultants that offer other sundry services;
- z. Parties that offer debt collection services.

**OBLIGATORY NATURE OF THE PROVISION OF DATA**

With regard to the purposes set out in points 1, 2, 3 and 4, the provision of data is necessary, and therefore the failure to provide the data, or the provision of partial or inaccurate data, will result in the inability to proceed with negotiations and execution of pre-contractual measures, to conclude the contract, to execute or fulfil the contract, to fulfil the legal obligations, and exercise defensive rights.

**PARTIES AUTHORISED TO PROCESS THE DATA**

The data may be processed by employees and workers of the business functions assigned to carry out the above purposes, who have been expressly authorized to process the data, who have received appropriate operating instructions, and who have been adequately informed and trained.

## TRANSFER OF THE PERSONAL DATA TO NON-EU COUNTRIES

Any transfer of data outside the EU/EEA will take place in compliance with the principles and conditions set out by the legislation.

## RIGHTS OF THE DATA SUBJECT – LODGING COMPLAINTS WITH THE SUPERVISORY

### AUTHORITY

By contacting the DPO by email at [privacy@almecogroup.com](mailto:privacy@almecogroup.com), Data Subjects may ask the Data Controller to give them access to their data, block and anonymise their data, correct inaccurate data, complete incomplete data, restrict processing in the cases envisaged by article 18 of the GDPR, as well as object to processing in the case of the legitimate interest of the Data Controller.

The data controller shall provide the data subject with the information relating to the request for the exercise of the data subject's rights (pursuant to articles 15 to 22 of the GDPR) without undue delay, and in any event at the latest within one month of receiving the request, as envisaged in article 12 of the GDPR.

Furthermore, in the event that the processing is based on consent or a contract and is performed with automated tools, the data subjects have the right to receive the data in a structured, commonly used and machine-readable format, and, if technically feasible, to have them sent to another data controller without impediment (Right to Portability), and to request the simultaneous or subsequent definitive cancellation of such data (Right to Be Forgotten). If the processing is based on consent for one or more purposes (art. 6, paragraph 1, letter A of the GDPR) and for the processing of particular data (art. 9, paragraph 2, letter A of the GDPR), the withdrawal of consent at any time does not affect the legality of the processing based on consent before such withdrawal.

Data subjects shall have the right to lodge a complaint with the Supervisory Authority having jurisdiction in the Member State of their habitual residence, place of work or place of the alleged infringement.