

CIRCULAR LETTER ON PERSONAL DATA PROCESSING

E-GRAPHIC SRL Unipersonale, with registered office in Viale EDISON, 4 - CAMPAGNOLA DI ZEVIO (VR), TAX and VAT No. 01337160236 (hereinafter referred to as "Data Controller"), in its capacity as the controller, wishes to inform you, pursuant to Art. 13 L. Decree no. 196 dated 30 June 2003 (hereinafter referred to as "Privacy Code") and Art. 13 of EU Regulation No. 2016/679 (hereinafter referred to as "GDPR") that your data will be processed with the methods for the following scopes:

1. Object of Processing

The Controller processes personal data for identification (e.g. name, surname, corporate name, address, telephone, e-mail, bank and payment data) – hereinafter referred to as "personal data" or only "data") which you communicate for the objectives listed herein.

2. Processing scopes

Your personal data are processed without your express consent (*Art. 24 lett. a), b), c) Privacy Code and Art. 6 lett. b), e) GDPR*), for the following Service Objectives:

- Conclusion of contracts for the Controller's services;
- Fulfilling the pre-contractual, contractual and fiscal obligations arising from the relationships established with you;
- Fulfillment of obligations provided by community law, regulation, or an order of the Authority (e.g. against money-laundering matters);
- Exercise of Controller's rights, e.g. the legal defense rights.

3. Processing methods

The processing of your personal data is done by means of the operations indicated in *Art. 4 Privacy Code and Art. 4 no. 2) GDPR* and specifically: gathering, registration, organization, conservation, consultation, elaboration, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure and destruction of data. Your personal data are subject to paper as well as electronic and/or automatized processing.

The Controller will process your personal data for the time necessary to fulfil the aforesaid aims and therefore for not more than 10 years from the termination of the Service Objectives relationship.

4. Access to data

Your data may be made accessible for the objectives referred to in Art. 2:

- To employees and collaborators of the Controller, in their capacities as data processors and/or processing officers and/or system administrators;
- To third parties or other subjects (e.g. credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, etc.) who carry out outsourcing activities for the Controller, in their capacities as external data processors.

5. Communication of data

Without needing an express consent (*pursuant to Art. 24 lett. a), b), d) Privacy Code and Art. 6 lett. b) and c) GDPR*), the Controller may communicate your data for the objectives referred to in Art. 2 to supervisory Bodies (such as IVASS - Institute for Insurance Supervision), Judicial Authorities, insurance companies for the provision of insurance services, as well as to those subjects for whom the communication is obligatory by law, for the performance of said objectives. Said subjects will process the data in their capacities as independent controllers. Your data shall not be disseminated.

6. Data transfers

The personal data are retained on servers located inside the European Union.

It is understood that the Controller, when necessary, shall have the faculty to move the servers also outside the EU. In such cases, the Controller ensures you that from now on, the transfer of the outside-EU data will be done in compliance with the applicable law provisions, after the stipulation of standard contract clauses provided by the European Commission.

7. Rights of the Data Subject

As the data subject, you can exercise the rights referred to in Art. 7 Privacy Code and Art. 15 GDPR and specifically the rights to:

- obtain the confirmation of the existence or not of your personal data, even if still not registered, and their communication in readable form;
- obtain an indication of the: a) origin of your personal data; b) processing scopes and methods; c) logic applied in case of processing performed with electronic instruments; d) identification data of the controller, processing officers and designated representatives pursuant to Art. 5, paragraph 2 Privacy Code and Art. 3, paragraph 1, GDPR; e) of the subjects or categories of subjects to which the personal data may be communicated or who may come to acquire such in their roles as designated representatives in the territory of the State, officers or assigned subjects;
- obtain the a) updating, rectification, when needed, for the completion of data; b) erasure, transformation into anonymous form or blocking of data processed in violation of the law, including those that are not necessary to conserve in relation to the objectives they were gathered for and subsequently processed; c) attestation that the operations referred to in letters a) and b) were transmitted, with regard to their content, to those to whom the data were communicated or diffused, except for cases where such fulfilment is impossible or entails the use of means clearly disproportionate with respect to the right protected;
- oppose, wholly or in part for legitimate reasons, the processing of your personal data, even more so if pertinent to data collection scopes.

Where applicable, you are also entitled to rights as referred to in Articles 16-21 GDPR (Right to rectify, to be forgotten, to restriction of processing, portability of data, right to oppose), as well as the right to lodge complaints with the Supervisory Authority.

8. Exercise of rights procedures

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

- A registered letter with return slip to E-GRAPHIC SRL Unipersonale, with registered office in Viale EDISON, 4 - CAMPAGNOLA DI ZEVIO (VR);
- an e-mail to the address amministrazione@e-graphic.it

9. Data Controller, data processors and assigned staff

The Data Controller is E-GRAPHIC SRL Unipersonale, with registered office in Viale EDISON, 4 - CAMPAGNOLA DI ZEVIO (VR).

The updated list of the processors and processing officers assigned to processing is kept in the registered office of the Data Controller.