

Imagicle Privacy Policy - Suppliers

(General Data Protection Regulation – GDPR 2016/679)

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Imagicle spa

Via Fondacci, 272
55054 Massarosa
(LU) Italy

T +39.0584.943232
F +39.0584.943325
E info@imagicle.com
W www.imagicle.com

€ 353.080,00 paid up cap.
VAT ID IT 01715870463
company reg. 01715870463

a company part of Zucchetti spa

Contents

1	Purposes of processing and legal basis.....	3
2	Compulsory or optional nature of the provision of data and consequences of a refusal to provide	3
3	Retention period.....	4
4	Contact details of the Data Controller	4
5	Receiver and transfer of non-EU data	4
6	Rights of the Data Subject	5

This policy is provided pursuant to Art. 13 of the GDPR 679/2016 – “European regulation on the protection of personal data”.

1 Purposes of processing and legal basis

We inform you that the personal data you provide and acquired by Imagicle Spa together with the signing of the assignment/ contract, will be processed in compliance with the guarantees of privacy and security measures required by current legislation, including the help of electronic tools directly and/ or through third parties, for the purposes set out below together with the legal basis of reference:

PURPOSES	PROCESSED DATA	LEGAL BASIS
A Purposes strictly related to the execution of contractual and pre-contractual measures and to respond to specific requests from the Data Subject	<ul style="list-style-type: none"> • Common Personal Data • Payment data and other financial data 	Processing necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract. - Art. 6 paragr. 1 lett. b)
B Purposes related to the fulfillment of fiscal, accounting and other legal obligations	<ul style="list-style-type: none"> • Common Personal Data • Payment data and other financial data 	Processing necessary for compliance with a legal obligation to which the Controller is subject. Art. 6 c.1 lett. c)
C Exercise of rights of the Data Controller, for example the right of defense in court	<ul style="list-style-type: none"> • Common Personal Data • Payment data and other financial data 	Processing necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Art. 6 c.1 lett. f)

2 Compulsory or optional nature of the provision of data and consequences of a refusal to provide

The nature of the provision of your personal data is mandatory so that the Data Controller can fulfill the obligations deriving and arising from the contractual relationship, as well as those imposed by law or regulations. Failure to provide your personal data may determine the impossibility to establish or continue the contractual relationship to the extent that such data are necessary for its execution.

3 Retention period

The data will be processed for the period of time necessary to pursue the aforementioned purposes and in any case no longer than the legal retention time required by law (currently 10 years from the moment of termination of the contractual relationship). In the event of a pending trial, the data will be processed until they are terminated.

4 Contact details of the Data Controller

The Data Controller of your personal data is Imagicle Spa, responsible for the lawful and correct use of your personal data, and who you may contact for any information or requests at the following addresses:

Registered office: Via Fondacci 272 - 55054 - Massarosa (LU)
Telephone: +39.0584.943232
Fax: +39.0584.943325
E-mail: administration@imagicle.com
Certified Email: imagicle@legalmail.it

You may furthermore address the Data Protection Officer to acquire information and forward requests regarding your data or to communicate disservices or any problem you may have encountered at the following addresses:

Name: Aksilia S.r.l.
Registered office: Via Fontana 22 - 20122 - Milano (MI)
Telephone: +39.02.40703351
E-mail: aksilia@aksilia.com
Certified Email: consiliasrl@pec.it

In the person of the reference manager, Dr. Battaglia Chiara, reachable at the abovementioned contact data and at the following cellphone number: +39.3478267770.

5 Receiver and transfer of non-EU data

Your data may be transferred outside the EEC. In this case the Data Controller ensures that the processing of your personal data by these subjects to whom the data is transferred, will be done in accordance with the European Regulation 679/2016, in compliance with the principles given in Art. 45 of GDPR 2016/679 in relation to the subsistence of adequacy decision by the European Commission, or in the absence of such decisions, in the presence of appropriate safeguards pursuant to Art. 46 of GDPR 2016/679 or in compliance to Art. 49 paragr. 1 lett. b) or c) – transfer necessary for the execution of a contract concluded between the Data Subject and the Data Controller. Further details and copy of the data may be obtained by contacting the Data Controller at the addresses given in point 4.

Your data can be communicated not only to the personnel assigned to the processing but also to the following:

- Consultants and companies that assist the Data Controller from an IT, infrastructural point of view and for the management of communication networks
- Private and public entities for the performance of administrative and legal practices in compliance with the provisions of EU Reg. no. 679/2016

- Professionals, consortia and service companies and professional firms in the field of assistance and consultancy relationships (e.g. from a tax, commercial, legal, communication point of view, etc.)
- Customers and other suppliers, limited to the pursuit of purposes related to the supply of goods and/ or the provision of services covered by the contract
- Insurance companies
- Banks and credit institutions

The data will not be subject to other methods of dissemination.

6 Rights of the Data Subject

We inform you that as Data Subject you have, in addition to the right to submit a complaint to the Supervisory Authority, the rights listed below, which you can exercise by making a specific request to the Data Controller and/or the Data Processor, contacting him at the addresses indicated in point “Contact details of the Data Controller”.

GDPR REGULATORY REF.	RIGHTS OF THE DATA SUBJECT
Art. 13, 14 – Right to be informed	You have the right to be informed about the rules, guarantees and rights in relation to the processing of your personal data and how to exercise your rights in relation to such processing. In particular, you have the right to have information regarding the specific purposes for which personal data are processed, the legal bases and the expected retention times
Art. 15 – Right of access	You have the right to obtain from the Controller, confirmation as to whether or not your personal data are being processed, and where this is the case, access to the personal data and information regarding the processing.
Art. 16 – Right of rectification	You have the right to obtain from the Controller without undue delay, the rectification of inaccurate personal data. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, also by means of providing a supplementary statement.
Art. 17 – Right of erasure (right to be forgotten)	You have the right to obtain from the Controller, the erasure of your personal data without undue delay and the Controller is obliged to erase the personal data without undue delay.
Art. 18 – Right to restriction of processing	You have the right to obtain from the Controller, restriction of processing where one of the following applies: a) The accuracy of the personal data is contested by the Data Subject, for a period enabling the

	<p>Controller to verify the accuracy of the personal data</p> <ul style="list-style-type: none"> b) The processing is unlawful, and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead c) The Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defense of legal claims d) The Data Subject has objected to processing pursuant to Art. 21, paragraph 1, pending the verification whether the legitimate grounds of the Controller override those of the Data Subject
Art. 20 – Right to data portability	<p>You have the right to receive data in structured, commonly used and machine-readable format automatized devices, and have the right to transmit such data to another Controller without hindrance from the Controller to which the data has been given. In exercising your rights regarding data portability, you are entitled to have the data transmitted directly from one Controller to the other, where technically feasible.</p>
Art. 21 – Right to object	<p>You have the right to object at any time to the processing of your personal data on grounds relating to your personal situation, based on Art. 6, paragraph 1, letters e) or f), including profiling based on those provisions. If you provided your consent to one or more specific objectives, you have the right to revoke that consent any time.</p>
Art. 22 – Right to automated decision making, including profiling	<p>You have the right not to be subjected to a decision based solely on automated processing including profiling, which produces legal effects concerning yourself or similarly affecting you.</p>

