



GSC GROUP S.p.A.
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Information on the processing of personal data of Customers/Partners/Suppliers

Pursuant to articles 13 and 14 of Regulation 2016/679/EU (hereinafter "GDPR") GSC GROUP SPA (hereinafter also "GSC" or "Data Controller") with headquarters in Montebello Vicentino (VI), Via dell'Industria, 5 – 36054, in its capacity as "Data Controller", informs you that your personal data collected for the purpose of concluding the contract with the Customer and/or within the scope of its execution and/or conclusion will be processed in compliance with the aforementioned legislation, in order to guarantee the rights, fundamental freedoms, as well as the dignity of natural persons, with particular reference to confidentiality and personal identity. We inform you that if the activities provided to you involve the processing of personal data of third parties in your ownership, it will be your responsibility to ensure that you have complied with the provisions of the legislation with regard to the subjects concerned in order to make their processing by us legitimate.

Origin, purpose, legal basis and nature of the data processed

The processing of your personal data, provided directly by you, is carried out by GSC GROUP SPA for the purpose of concluding the contract with the Customer and/or within the scope of its execution and/or conclusion.

Furthermore, it is possible that there may be a processing of personal data of third parties communicated by the Customer to the Company. With respect to this hypothesis, the Customer acts as an independent data controller and assumes the consequent legal obligations and responsibilities, indemnifying the Company against any dispute, claim and/or request for compensation for damage from processing that should come to the Company from third parties concerned.

In compliance with the current legislation on the protection of personal data and without the need for specific consent from the data subject, the Data will be stored, collected and processed by the Company for the following purposes:

- a) fulfilment of pre-contractual/contractual obligations, execution and/or conclusion of the contract and/or management of any pre-contractual measures. The data processed are: personal data; contact data; payment data; accounting data; data referred to in articles 9 and 10 Reg. EU/679 possibly necessary for the management of the relationship;
- b) fulfilment of any regulatory obligations, tax and fiscal provisions deriving from the conduct of the business activity and obligations related to administrative-accounting activities. The data processed are: personal data, contact data, payment data, accounting data;
- c) sending, directly or through third party providers of marketing and communication services, newsletters and communications for direct marketing purposes through e-mail, sms, chat, push notifications, paper mail, telephone with operator, in relation to products provided by other companies pursuant to art. 130 c. 1 and 2 of Legislative Decree 196/03 (hereinafter "Code"). The data processed are: personal data, contact data;

The legal bases of the processing for the purposes a) and b) indicated above are art. 6.1.b) and 6.1.c) of the Regulation.

The provision of Data for the aforementioned purposes is optional, but the possible failure to provide the Data and the refusal to provide them would make it impossible for the Company to carry out pre-contractual activities, execute and/or conclude the contract and provide the services requested by the same.



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The legal basis for the processing of personal data for the purposes c) is art. 6.1.a) of the GDPR as the processing is based on consent; it is specified that the Data Controller can collect a single consent for the marketing purposes described here, pursuant to the General Provision of the Guarantor for the protection of personal data "Guidelines on promotional activity and combating spam" of 4 July 2013. The provision of consent to the use of data for marketing purposes is optional and if, the interested party wishes to oppose the processing of Data for marketing purposes carried out with the means indicated here, as well as revoke the consent given; he can do so at any time without any consequence (except for the fact that he will no longer receive marketing communications) following the indications present in the section of the "Rights of the Interested Party" of this Information.

Finally, it is recalled that for the processing carried out for the purpose of direct sending of its own advertising material or direct sales or for the performance of its own market research or commercial communications in relation to products or services similar to those used, the Company can use the e-mail addresses or personal data pursuant to and within the limits allowed by art. 130, paragraph 4 of the Code and by the provision of the Authority for the protection of personal data of 19 June 2008 even in the absence of explicit consent. The legal basis for the processing of data for this purpose is art. 6, paragraph 1, letter f) of the GDPR, without prejudice to the possibility of opposing such processing at any time, following the indications present in the section of the "Rights of the Interested Party" of this Information.

Communication

The data may be communicated to third parties appointed as data processors pursuant to article 28 of the GDPR and in particular to banks, companies active in the insurance field, service providers strictly necessary for the conduct of the company's business, or to company consultants, where this proves necessary for tax, administrative, contractual reasons or for needs protected by current regulations.

Your personal data, or the personal data of third parties in your ownership, may also be communicated to external companies, identified from time to time, to which GSC GROUP SPA entrusts the execution of obligations arising from the assignment received to which only the data necessary for their activities will be transmitted. All employees, consultants, temporary workers and/or any other "natural person" who carry out their activity on the basis of instructions received from GSC GROUP SPA, pursuant to art. 29 of the GDPR, are appointed "Data Processors" (hereinafter also "Data Processors"). To the Data Processors or Managers, possibly designated, GSC GROUP SPA gives adequate operational instructions, with particular reference to the adoption and compliance with security measures, in order to be able to guarantee the confidentiality and security of the data. Precisely with reference to the aspects of protection of personal data, you are invited, pursuant to art. 33 of the GDPR to report to GSC GROUP SPA any circumstances or events from which a potential "personal data breach" may arise in order to allow an immediate evaluation and the adoption of any actions aimed at countering such an event by sending a communication to GSC GROUP SPA at the addresses indicated below.

The Data will not be disseminated.

The obligation of GSC GROUP SPA to communicate the data to Public Authorities on specific request remains firm.

Transfer abroad

Your personal data are not transferred outside the European Economic Area. If the transfer of data to Extra EU countries is necessary for the management of your relationship, these will be transferred to Third Countries or organizations whose adequacy is recognized by decision of the European Commission. In the absence of such a decision, the transfer will take place if adequate guarantees of protection of personal data are provided. In any case, only the data necessary to pursue the intended purposes will be communicated and the regulatory instruments provided for in Chapter V of the GDPR will be applied.



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Methods, logic of processing and retention times

Your data is collected and recorded in a lawful and correct manner for the purposes indicated above in compliance with the principles and prescriptions of art. 5 c 1 of the GDPR.

The processing of personal data takes place through manual, computerized and telematic tools with logic strictly related to the purposes themselves and, in any case, in order to guarantee their security, integrity and confidentiality.

Personal Data will be processed by GSC GROUP SPA for the entire duration of the assignment and also subsequently to assert or protect its rights or for administrative purposes and/or to execute obligations arising from the regulatory and normative framework applicable from time to time and in compliance with specific legal obligations on data retention. The data processed for the purposes referred to in points a), b) will be kept for 10 years from the date of termination of the relationship or for the duration provided for by National and European legislation. The data referred to in point c) will be processed until the revocation of consent and in any case for a period not exceeding that indicated for the treatments referred to in points a), b).

Rights of the Data Subject

In compliance, within the limits and conditions provided for by the legislation on the protection of personal data regarding the exercise of rights as expressed in articles 15 to 22 of Regulation 2016/679/EU concerning the processing subject of this Information, as a Data Subject in the manner provided for by art. 12 Reg. 2016/679/EU, you have the right to ask for confirmation whether or not a processing of your personal data is in progress, access the personal data that concern you and you have the right to request their rectification, cancellation, notification of rectifications and cancellations to those to whom the data have been possibly transmitted by our Organization, the limitation of processing in the hypotheses provided for by the standard, the portability of personal data - provided by you - in the cases indicated by the standard, to oppose the processing of your data and, specifically, you have the right to oppose decisions that concern you if based solely on automated processing of your data, including profiling. In the event that you believe that the processing that concerns you violates the rules of the GDPR, you have the right to lodge a complaint with the Guarantor pursuant to art. 77 of the GDPR.

If you intend to request further information on the processing of your personal data or for the possible exercise of your rights, you can contact in writing at the e-mail address privacy@gscspa.it, ordinary mail or by contacting the Data Controller using the other contact details available.

Data Controller and contact details

The Data Controller, pursuant to art. 4 of the GDPR, is GSC GROUP SPA, Via dell'Industria, 5 – 36054 Montebello Vicentino (VI) VAT: 0355990240 - CF: 0355990240, tel. +39 0444 670949, e-mail: privacy@gscspa.it

Data Protection Officer

The Data Controller, pursuant to art. 37 of Regulation EU 679/2016, has deemed it unnecessary to appoint a Data Protection Officer.

The Data Controller

GSC GROUP SPA

Update 13/12/2023