



Subject: Privacy policy statement pursuant to article 13 of Regulation (EU) 2016/679

(hereinafter “GDPR”)

Regulation (EU) 2016/679 safeguards the confidentiality of personal data in protection of the freedom and rights of the data subjects and therefore imposes a series of obligations on those who “process” personal data referring to other persons. The most important fulfilments imposed by the law include that of informing the data subjects and acquiring, in the appropriate cases, their consent to processing, particularly for processing activities in relation to which the data must be communicated to other entities.

In light of the foregoing, therefore, we hereby inform you, in accordance with article 13 of the GDPR in question, that the writer firm collects and processes data about your company without your express consent (art. 24 let. a), b), c) Italian Personal Data Protection Code and art. 6 let. b), e) GDPR for purposes related to the management of ordinary commercial relationships and, more precisely, for the compilation of databases, keeping of customer/supplier accounts, invoicing and creditor management to satisfy all obligations provided by existing regulations.

Your data, in addition, may be processed for exclusively internal purposes of statistics and market research; *only subject to your specific and separate consent (articles 23 and 130 Personal Data Protection Code and art. 7 GDPR), for the following Marketing Purposes:*

- the sending via email, post and/or text message and/or telephone contacts, of newsletters, marketing communications and/or advertising material on products or services offered by the Data Controller and surveying of the degree of satisfaction with the quality of the services;
- the sending via email, post and/or text message and/or telephone contacts of marketing and/or promotional communications of third parties.

The processing of your personal data takes place through the operations specified in art. 4 of the Personal Data Protection Code and art. 4, comma 2 of the GDPR, and specifically: collection, recording, organisation, storage, consultation, treatment, alteration, selection, retrieval, alignment, use, combination, blocking, disclosure, erasure or destruction of data. Your personal data are processed both on paper and by electronic and/or automated means.

The Data Controller will process the personal data for the time necessary to fulfil the purposes indicated above and in any case for no more than 10 years from the termination of the relationship for administrative/accounting purposes and for no more than 2 years from collection of the data for Marketing Purposes.

The processing may be performed using both IT and manual tools, in compliance with all necessary precautions guaranteeing the security and confidentiality of the information.

Your data, in addition, may be disclosed to third parties, exclusively for technical and operational requirements strictly linked to the purposes illustrated above and in particular to the following categories of entities:

- a) bodies, professionals, companies or other structures appointed by us to perform processing connected to the fulfilment of administrative, accounting and managerial obligations linked to the ordinary conduct of our economic activity, also for credit recovery purposes;
- b) public authorities and administrations for purposes connected to the fulfilment of legal obligations;
- c) banks, financial institutions or other entities to which the transfer of the aforementioned data is necessary for the conduct of our company’s activity in relation to the fulfilment, by us, of the contractual obligations accepted towards you.

In your capacity as data subject, you hold the rights specified in art. 7 of the Personal Data Protection Code and art. 15 of the GDPR, and specifically the rights to:

- i. obtain confirmation as to whether or not personal data concerning you exist, regardless of their being already recorded, and disclosure of such data in intelligible form;
- ii. obtain the following information: a) the source of the personal data; b) the purpose and processing methods; c) the logic applied to the processing, if the latter is carried out with the help of electronic means; d) the identification data concerning Data Controller, Data Processors and the representative designated as per article 5, comma 2 of the Personal Data Protection Code and art. 3, comma 1 of the GDPR; e) the entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data in their capacity as designated representative(s) in the State’s territory, data processor(s) or person(s) in charge of the processing;
- iii. obtain: a) the updating, rectification or, where interested therein, integration of the data; b) the erasure, 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) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.
- iv. object, partially or entirely: a) on legitimate grounds, to the processing of personal data concerning you, even though they are relevant to the purpose of the collection; b) to the processing of personal data concerning you, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys, with the use of automated systems not involving an operator, by email and/or by traditional marketing means using the telephone and/or paper mail.



CUSTOMER AND SUPPLIER PRIVACY POLICY

Annex 5
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It should be noted that the data subject's right to object, as per point b) above, with regard to direct marketing by automated means, also extends to traditional means, and that in all cases the data subject retains the right to exercise the right to object even only partially. Therefore, the data subject may decide only to receive communications by traditional channels, or only automated communications, or neither of the two types of communication.

Where relevant, the data subject also has the rights set out in art. 16-21 of the GDPR (right to rectification, right to be forgotten, right to restriction of processing, right to data portability and right to object) and the right to complain to the Data Protection Authority.

Methods of exercising rights

You may at any time exercise your rights by sending:

- a registered letter with return receipt to the **ITALIAN DATA PROTECTION SUPERVISORY AUTHORITY (Garante della Privacy)**
- an e-mail to the address: **info@wmsystem.com**

The Data Controller is **MAZZOLI WILLIAM**, with registered office in Via **2 GIUGNO, 5** postcode **42047 - ROLO (Reggio Emilia, Italy)**

The updated list of the persons in charge of data processing and data processors is conserved at the BUSINESS premises of the Data Controller, in **VIA CAMPOGRANDE 94/96 - 42047 ROLO**.