

Dear Client,

Following the measure imposed by the EU Regulation, we hereby provide you with all information regarding use by the underwriting company of the personal details acquired with regards to the contractual relations between us or that may be undertaken in the future.

Source of personal data

The data that we have, acquired with reference to the contractual relations collected directly from the interested party. All of the data collected will be processed in total compliance of current norms and, in any case, with due confidentiality.

Objective of processing

The exclusive objective of collection or processing of personal data is to adequately fulfil the obligations connected with execution of the economic activities of our company and in particular: requirements prior to stipulation of a contract; fulfilment of the contractual obligations of an accounting, management and administrative nature with regards to the interested party through the execution of an act, several acts or a range of operations necessary for execution of the aforementioned obligations; execution of legal obligations. The data will be used for business correspondence through the use of coordinates of email addresses or street addresses. As the activities in question are not ongoing with regards to the companies, such processing does not require consent for processing (soft spam).

The personal data that the interested party may have transmitted through the Contacts page of the institutional website may also be processed, for the objective of providing a reply to the information requested and institutional publicity. For these activities specific consent is requested for processing, representing a specific legal basis. At any time this consent may be withdrawn. Such data, whose conferment is optional, will be processed in a printed and also in an electronic format by individuals nominated and involved in processing operations and will only be diffused for the objectives listed. Sensitive information will not be collected. Such data will be stored for a period of time necessary for the objectives indicated above and will subsequently be destroyed.

Processing methods

With reference to the objectives indicated, processing of personal data will be carried out using manual and electronic instruments with logics strictly correlated with the objectives themselves and, in any case, in such a way as to guarantee the safety and confidentiality of the data itself in observance of the aforementioned law. Such data will be stored for 10 years and in any case in coordination with current norms related to contractual relations and tax matters.

Nature of the collection

For stipulation and execution of the contractual relations, the collection of personal data is also considered obligatory as it must give course to legal and tax requirements, the right to provide such data will result in the impossibility of establishing relations with the company. Relative processing does not require consent of the interested party.

Communication and diffusion

Personal data and their relative processing may be the subject of communication to companies for the execution of economic activities (business, management, handling of information systems, insurance, bank or non bank intermediation activities, factoring, management of despatches, bagging and sending of correspondence) or for the performance of legal norms (accounting firms, lawyers). The data will not be diffused and will not be sent outside of the EU. The individuals involved in processing operations will come into contact with your data.

Rights of the interested party

The interested party may contact the Privacy Service with the controller of elaboration activities to check his data and integrate, update or change them and/or to execute other rights as contained in article 15 of the EU Regulation (attached).

Controller of processing activities

The controller of processing activities is Cipolla Fratelli Srl, with headquarters in via Privata De' André 11 - Strada Provinciale 107 - 26817 San Martino in Strada (LO).

Art. 15. EU Regulation UE 2016/679

1. The interested party has the right to acquire from the controller of processing activities, confirmation of whether or not personal data processing activities are underway and, in this case, to acquire access to personal data and to the following information:

- a) objective of the processing;
- b) the categories of personal data in question;
- c) the beneficiaries or categories of beneficiaries to whom personal data has been or will be transmitted, in particular if they are beneficiaries of third parties or international organisations;
- d) whenever possible, the storage period of personal data necessary and, if possible, the criteria used to establish such period of time;
- e) existence of the right of the interested party to ask the processing controller to modify or cancel the personal data or limitation of his personal data or object to such processing;
- f) the right to propose a complaint to the control authority;
- g) if data has not been collected from the interested party, all of the information available on its origin;
- h) the existence of an automated decision making process, including profiling as per article 22, paragraphs 1 and 4, and at least in these cases, important information on the logic used, as well as the importance and consequences of such processing for the interested party.

2. If the personal data is not transferred to a third party or to an international organisation, the interested party will have the right to be informed of the existence of adequate guarantees in compliance with article 46 with regards to the transfer.

3. The collector of elaboration will provide a copy of the personal data. In the case of further copies requested by the interested party, the collector may charge a reasonable fee based on administrative costs. If the interested party presents a request through electronic means, save any other indications provided by the interested party, the information will be provided in a normal electronic format.

4. The right to receive a copy as indicated in paragraph 3 shall not damage the rights and freedom of others.