



## GDPR INFORMATION - EU Regulation 679/2016

In accordance with art. 13 and 14 of EU Regulation 679/2016 containing the controls relating to the protection of natural persons with respect to personal data processing, as well as the free movement of such data, SIMOL SPA writes, in its capacity as data controller, to advise that the personal data acquired in relation to the commercial relations established will be subject to processing in compliance with the regulation referred to above. In relation to the aforesaid processing, it also provides the following information.

### Data Controller and Data Processor

The identification details of the Data Controller are as follows:

Company name: SIMOL SPA  
Legal Representative: VITTORIO SILVANI  
Registered office: Via Fiocchetti, 14 Loc. Codisotto – 42045 Luzzara (RE), Italy  
Tel.: +39 0522 976728  
E-mail/PEC (Italian certified e-mail): [simolspa@pec.it](mailto:simolspa@pec.it)

### Personal data collected

The personal data collected essentially concerns:

- identification data;
- data concerning the economic and commercial activity;
- personal data, e-mail address and telephone number of your staff with whom we maintain economic relations;

This data is provided by you directly, or it can be collected by autonomous third-party data controllers.

### Methods of processing

The personal data will be processed on paper, on computers and remotely and entered in the relevant databases, which can be accessed by – with these parties therefore potentially becoming aware of it – the staff of the commercial, production and administration departments, staff specifically appointed by SIMOL SPA as personal data processing staff and who can perform operations of consultation, use, processing, comparison and any other suitable operation, including automated ones, in observance of laws designed to guarantee, among other things, the confidentiality and security of data as well as its accuracy, updating and relevance of the data with respect to the stated purposes.

### Purposes of processing

The purposes of the personal data processing are as follows:

1. performance of the contracts stipulated with you and of the related obligations;
2. fulfilment of the legal obligations connected to the contractual relationship;

3. organisational and commercial management of the contract;
4. protection of contractual rights;
5. internal statistical analyses;
6. marketing activities through the sending of promotional and advertising material concerning products or services similar to those relating to the existing commercial relationship;
7. information on solvency

### **Legal basis of processing**

In accordance with art. 6, the data is processed on the basis of the consent expressed by the data subject. Alternatively or in addition to consent, the processing is carried out for the purpose of fulfilling a contractual/pre-contractual or legal obligation, protecting vital interests of the data subject or of third parties, performing a service of public interest or exercising official authority, or pursuing the legitimate interest of the data controller or of third parties, on condition that the interests or rights and fundamental freedoms of the data subject that require the protection of personal data do not take precedence.

### **Nature of data provision**

The provision of the data and corresponding processing are mandatory in connection with purposes no. 1, 2 and 4 concerning obligations of a contractual and legal nature; provision is also to be considered mandatory in connection with purpose no. 3, which refers to the performance of all the activities of SIMOL SPA necessary and useful for the performance of contractual obligations; it follows that any refusal to provide the data for these purposes may make it impossible for SIMOL SPA to enter into the contractual relationships themselves and perform legal obligations. The provision of data and related processing is to be considered optional in the other situations.

### **Recipients of personal data**

In relation to the purposes indicated in points 1, 2 and 4, the data may be communicated to the following parties or categories of party indicated below:

- Transport companies and shipping agents for aspects connected with shipping goods and customs procedures;
- Banks for management of collections and payments;
- Financial authorities and other companies or public bodies to fulfil regulatory requirements;
- Law firms and companies for the protection of contractual rights.

For purpose no. 3, the data may be communicated to agents, representatives, brokers who work for SIMOL SPA, contractors or self-employed persons and client companies.

For purpose no. 5, communication of the data is not envisaged except for the transmission of statistics in an aggregate and anonymous form.

For purpose no. 6, external communication of the data is not generally envisaged except for communication to agents or representatives of SIMOL SPA who deal with the presentation or delivery of material in the situations already authorised by the client through expressed consent.

For purpose no. 7, the data may be communicated to commercial information companies and agencies.

The personal data may also be communicated to other parties where communication is dictated by a legal or contractual obligation or is necessary for the purposes of entering into a contract.

The distribution of personal data is not envisaged.



## **Transfer of data to a country outside of the European Union or to an international organisation**

With reference to the purposes referred to in point 1, 2, 3 ..., SIMOL SPA advises that the personal data of the data subject may be transferred outside of the territory of the European Union subject to the specific consent of the data subject.

In the absence of consent, the data may be transferred to countries outside the EU for which there is an adequacy decision of the EU Commission in accordance with art. 45 or adequate safeguards are provided as referred to in art. 46 of Regulation 679/16.

## **Data retention period**

The personal data is retained for the time strictly necessary to perform the purposes of processing and consequently varies in relation to each specific purpose.

The Controller may retain some data also after the termination of the contractual relationship, for the time necessary to perform contractual and legal obligations.

## **Rights of data subjects**

In relation to the aforesaid processing, the data subject may exercise the following rights referred to in EU Regulation no. 679/2016 at any time:

- Data subject's right to access (*art. 15*)
- Right to rectify inaccurate data and complete incomplete data (*art. 16*)
- Right to deletion of personal data (*art. 17*)
- Right to limitation of processing (*art. 18*)
- Right to personal data portability (*art. 20*)
- Right to object (*art. 21*)
- Right to lodge a complaint with the Supervisory Authority (*art. 77*)

The rights are enforced in compliance with the conditions and limits envisaged in accordance with art. 12 and 23 of the regulation.

Further information concerning the processing and communication of data provided directly or acquired in other ways may be requested from the Marketing Department at the company's office.

This notice does not of course rule out other information being given to the data subjects at the time of data collection, also orally.