



C.L. S.R.L.
Via Arlotti 7/A
42122 Reggio Emilia (RE) Italy
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PRIVACY INFORMATIONS ON PERSONAL DATA PROCESSING

Commercial relationship management, administration and business promotion

The european General Data Protection Regulation (GDPR) in article 13, enforce data controller to inform data subjects on key elements of data processing.

DATA CONTROLLER

The data controller is **C.L. S.R.L.**, VAT Number: IT01991450352, established in Via Arlotti 7/A 42122 Reggio Emilia (RE) - ITALY, e-mail address: amministrazione@clgroup.it (from here also "Data controller" o "Controller").

PURPOSES OF PROCESSING	LEGAL BASIS
A. To carry out commercial and information requests received in order to establish a commercial partnership; B. To perform contractual agreements, to carry out pre-contractual needs and to manage the service provision; C. To manage the administration related to commercial relationships; D. To manage disputes with partners; E. To perform business promotion activities (as to send advertising material and complete market researches) directly to data subjets.	<ul style="list-style-type: none">• To the performance of an agreement in which the data subject is party or in order to take steps at the requests of the data subject prior to entering into a contract;• Attempt to legal obligations;• Legitimate interest of Data Controller, consisting in the:<ul style="list-style-type: none">○ management of litigations;○ business promotion, performing marketing activities with <i>Soft Spam</i> modalities;

DATA PROCESSING METHODS

The personal data processing activities to achieve the aforesaid purposes are performed in compliance with the European law on personal data protection (GDPR) and subsequent amendments and additions.

The processing will be also performed with IT, papery and telematic means able to guarantee the effectiveness, the security and entirety of data processing, adopting the relevant security measures congruent to the risk caused by processing activities.

The data controller will process only the personal data required to manage the communication with data subjects to satisfy specific forwarded requests, to provide the services (identification data, contact details and postal address, etc.), and to perform the administrative management related to the commercial relationship.

The marketing activities may be developed by data controller with methods that will not affect in any way the rights and the freedoms of data subjects and considering their reasonable expectations concerning promotion communications.

The marketing activities performed with *Soft Spam* modalities will be carry out in absence of data subject's explicit consent, as far as the communications have the following features:

- it consists in sending e-mail messages to recipients which have already entertained commercial relationship with **C.L. S.R.L.** and the e-mail address has been communicate to manage the business relations;
- the content is related to products or services related to those which reciepiant has already purchased.

The data subject has the faculty to excersice his rights, to oppose or to limit the processing activities. Data subjects may exercise his rights when personal data are collected or whenever a e-mail with marketing purposes will be received.

The processing activities may change according to the services requested and more information related to personal data processing methods are available on request from the data controller.

DATA PROVISION AND CONSEQUENCES OF REFUSAL TO PROVIDE THE DATA

The provision of personal data is sometimes:

- mandatory, if data transmission is required to attempt to legal obligations; the denial of provision will result in our incapacity to fulfill the obligations assumed in contractual relations;
- conditioning, if data transmission is required to perform contractual agreements, to carry out pre-contractual requests and to provide the service; the denial of transmission will affect our ability to properly manage our commercial relationship;
- optional, for processing activities related marketing and business promotion purposes.



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PERSONAL DATA COMMUNICATION AND TRASMISSION OF DATA TO THIRD PARTIES

The recipients or categories of third subjects of data are possibly:

- post office or other delivery companies;
- banks, credit institutions, debt collection companies and insurance firms;
- law and debt collection firms;
- companies that provide maintenance/repair services of IT equipment;
- professional firms, companies and consultants who perform business consultancy, processing or other technical and specialized services;
- professional firms, companies, associations of companies and/or entrepreneurs who provide us certain services, such as accounting, tax service, etc.
- companies that manage datacenter, database and application software;
- public bodies and administrations;
- companies and entities performing, on our behalf, marketing and promotion activities of our business and our products.

More information concerning the third parties who may be able to access your personal data are available on request from the data controller.

DATA RETENTION

Your personal data will be stored in our customer's databases for the period strictly necessary to achieve the processing purposes for which those data are collected, as following described.

Business relations and administration management

- if business relationship take place, your data will be stored for the period of 10 years after the relationship ends, unless that legal obligations or litigation management needs enforce a longer period of retention;
- if business relationship doesn't take place, personal data collected to carry out pre-contractual needs will be stored not more than 3 years after collection.

Promotion and marketing activities management:

- if the recipient of commercial messages is an acquired customer, the data retention period would be the same as for business and administration period (10 years after business relation ends), unless data subject exercise his rights to prevent data controller to perform this data processing activity;
- if the recipient is a potential customer or data processing is based on the explicit consent of data subject, your data will be stored until the revocation of your explicit consent, unless data subject exercise his rights to prevent data controller to perform this data processing activity.

DATA SUBJECTS RIGHTS

You are informed of the existence of your right to request **access** to your personal data, **rectify and cancel** the same, **restrict the processing of data** concerning yourself, **object** to their processing, **data portability** (Articles 15 to 22 of the EU Regulations 2016/679 GDPR).

To exercise your rights and know the third parties to whom data would be communicated you can write to the following e-mail address: amministr@clgroup.it.

You are entitled to file your complaints with the control authority at the Supervisory Authority address for the protection of personal data, by sending a certified e-mail to the address protocollo@pec.gdpd.it, or with the control authority of another EU member country.

Reggio Emilia, 08/07/2021