

**PERSONAL DATA PROTECTION STATEMENT PURSUANT TO ART. 13 OF THE G.D.P.R. 679/2016 -
CUSTOMERS AND SUPPLIERS**

This statement is addressed to all our customers and suppliers and in general natural person operators or natural persons representing legal entities whose personal data we acquire, such as personal details and telephone and electronic contact details such as email and social media references in contractual/commercial relationships related to our business.

Please note that your personal data shall be processed in compliance with your fundamental rights and freedoms, as well as with respect for the dignity of the Data Subject, with particular reference to their confidentiality, personal identity, personal data rights and protection.

Pursuant to Article 13 of EU Regulation 2016/679, we hereby provide the following information.

PURPOSES OF PROCESSING

Processing of personal data takes place for the following purposes:

1. To comply with statutory requirements of an administrative, accounting and tax nature, and to enable the effective management of professional, financial and business dealings;
2. Performance of service or supply contracts (including audit monitoring activities);
3. to assert or defend a right in court or out of court.

The legal basis of the processing is:

- for the purpose referred to in point 1: a legal obligation;
- for the purpose referred to in point 2: the contractual or pre-contractual relationship existing between the parties and legitimate interest;
- for the purpose referred to in point 3: right to assert or defend a right of the Data Controller.

MANDATORY AND OPTIONAL PROVISION OF DATA AND THE CONSEQUENCES OF REFUSAL

Conferring the personal data and authorising the consequent processing of the same is optional. Nevertheless, the provision of the data is necessary for the purposes stated in the point above. Any refusal to provide the data, or the provision of partial or inaccurate or no data, will make it impossible to fulfil and perform, in part or in whole, the stated purposes of processing.

HOW DATA IS PROCESSED

Personal data will be processed both manually, in paper format, and using electronic means. Electronic processing is based on the proprietary systems and databases of the Data Controller and involves appropriate computerised procedures for the storage, management and transmission of data, using methods and logics designed to guarantee the security and confidentiality of the data.

RETENTION PERIODS

Personal data will be processed for the time necessary to satisfy the stated purposes for which they were collected and to fulfil contractual obligations and statutory and regulatory requirements, without prejudice to the statutory limitations and time-limits of rights and in compliance with resulting obligations. In any event, for no more than 10 years + 1 from the termination of the relationship.

WHO MAY ACCESS THE DATA

The personal data will be processed by parties expressly and specifically appointed by the Data Controller, in the capacity of external Data Processors or authorised persons. Personal data may also be processed by outsourcers engaged to provide services connected with the purposes of processing and which our organisation may designate as Data Processors in charge of the data processing operations they perform, to ensure greater protection.

DISCLOSURE AND PUBLICATION

The data may be communicated, with this term meaning to be made known to one or more specific parties, other than the Data Controller, external Data Processors and identified and appointed authorised Data Processors, for the pursuit of the purposes indicated above and in any event within the same limits, as follows:

- to public or private entities duly entitled to access the data under laws, regulations or European Union legislation, within the limits they provide;
- to external parties (e.g. CAPI GROUP SRL consultants, banks, insurance companies etc.) within the limits necessary to carry out their assigned duties for our organisation.

Personal data will not be published, meaning that the information will not be disseminated in any way, either by being made public or available for consultation, unless you specifically give your free and informed consent for each type of processing.

RIGHTS OF THE DATA SUBJECT AND CONTACT DETAILS

The Data Subjects to whom the data refer can opt to exercise the rights envisaged by the G.D.P.R. 679/2016 as specified below, at any time:

Article 15- Right to access data, Article. 16 - Right to correct data, Article 17 - Right to cancel data (right to be forgotten), Article 18 - Right to limit the processing, Article 20 - Right to data portability, Article 21 - Right to object to the processing
Article 22 - Right not to be subjected to an automated decision-making process, including profiling, Article 7 - Right to revoke consent, Article 77 -Right to submit a complaint to the Supervisory Authority

To exercise their rights, and request the updated list of Data Processors in charge of the processing, the Data Subject can send their requests in a specific communication sent by post addressed to the company, or to the email address: privacy@capigroup.it to directly contact the Data Controller to receive a prompt response.

TRANSFER OF THE DATA ABROAD

Please note that the Data Controller does not currently transfer your personal data to any third countries or international organisations.

Should it decide to transfer your personal data to a third country or international organisation, this transfer will only take place if an adequacy decision has been made by the European Commission or, in case of the transfers described in Articles 46 and 47, or Article 49, second paragraph, only in the presence of express reference to the appropriate or opportune guarantees, and to the means for obtaining a copy of said data or the place in which they have been made available.

DATA CONTROLLER

The personal data Controller is CAPI GROUP SRL with headquarters in via Brennero 2, Calliano (TN)
CAPI GROUP SRL keeps an updated list of named Data Processors, and guarantees Data Subjects access to the list at the office indicated above.

Date of last amendment, 17/12/2019

**The Data Controller
CAPI GROUP SRL**