

Policy pursuant to and for the purposes of eu regulation 2016/679 (GDPR) on the protection of personal data for contact persons at customers or suppliers, or for customers or suppliers established as sole proprietorships

With a view to full compliance with current legislation and the data confidentiality, Alberto Sassi S.p.A. (hereinafter the "company", the "Controller" or "we") hereby informs you that, for the establishment and management of the commercial and business relationship in place or that you wish to establish, it is the Controller of the data that belongs to you or to your personnel and that qualifies as personal data under Regulation (EU) 2016/679. In this regard, we hereby inform you below of all details relating to data processing.

Categories of data subject to processing

Alberto Sassi S.p.A. will process personal and contact data (e.g. name and surname, e-mail, telephone number, etc.) of your reference personnel (employees or collaborators) or of the shareholders or directors of your company, to whom you are required to communicate this policy, if necessary for management of the relationship with your company, including the related administrative and accounting requirements.

Purpose and legal basis of processing

The processing of the above mentioned data is necessary for execution of a contract to which your company is a party or for execution of pre-contractual measures taken at your request (art. 6, para. 1, letter b) of Regulation (EU) 679/2016) and in any case for management of the commercial and business relationship in place or that you wish to establish.

The processing of personal and contact data may also take place in order to inform you and keep you updated on products or services or news of the company through the newsletter service. The legal basis for this processing is the consent freely provided by you by filling in the appropriate registration form for the service, as well as the legitimate interest of the Controller to keep you informed and updated on the latest news.

In order to establish this relationship, personal data may also be acquired that could reveal the possible existence of criminal convictions as well as ongoing criminal proceedings with respect to some of the persons mentioned above (e.g. top management or members of the board of directors), for example in order to comply with the requirements of anti-mafia and anti-terrorism legislation. This specific processing is necessary for the fulfilment of legal obligations to which the Data Controller is subject (art. 6, para. 1 letter c) of Regulation (EU) 679/2016).

Mandatory or optional nature of data provision and consequences of a refusal to provide data

The provision of the data described above for management of the commercial and business relationship with Alberto Sassi S.p.A. is optional but necessary for the establishment of the above mentioned relationship. The provision of the data described above for compliance with the requirements of anti-mafia and anti-terrorism legislation is mandatory. Any refusal, in whole or in part, to provide such data, or any incorrect or untrue provision, will make it impossible for the Controller to establish and/or continue the contractual relationship with your company. Provision of the data described above for subscribing to the company's newsletter service is optional. Any refusal will make it impossible for the Controller to keep you informed and updated on the latest news.

Processing methods

Data processing will be carried out in accordance with the principles of correctness, lawfulness and transparency, in compliance with the principles set out in art. 5 of Regulation (EU) 2016/679, with manual, paper, computer, telematic and automated tools, including those for storing, managing or transmitting the data, in any case suitable to ensure data security and confidentiality.

Data retention periods

The data will be retained at the registered office of the Controller for the entire duration of the contractual and business relationship and, subsequently, for the period of time provided for by legislation, including that relating to accounting, applicable to the aforementioned relationship. At the end of this period the data will be deleted or made anonymous.

Scope of communication and dissemination of personal data and transfer abroad

Your data will be processed according to principles of correctness, lawfulness, transparency and protection of your privacy and your rights and may be accessed by the entities/parties listed below, by way of example, having their registered office in Italy and/or abroad, (both EU countries and third or non-EU countries which, according to the Commission, guarantee the adequate level of protection referred to in Article 45 of the GDPR) exclusively for the purposes specified above and for normal business management:

- Employees and collaborators, also external to the company, employed in various areas and functions, as persons in charge of processing or external data processors.
- Professionals or service companies for business administration and management that operate on behalf of the undersigned company, as well as the employees and collaborators of the same, as persons in charge of processing or external data processors.
- Professionals or tax, administrative, occupational safety, privacy, etc. consulting companies that operate on behalf of the undersigned company, as well as the employees and collaborators of the same, as persons in charge of processing or external data processors.
- Professionals or IT consultancy firms operating on behalf of the undersigned company, as well as their employees and collaborators, as persons in charge of processing or external data processors.
- Other Alberto Sassi S.p.A. group companies for execution of the activities connected with the commercial and business relationship in place.

Rights of the data subject

With regard to the personal data provided, we hereby inform you that you can, at any time, exercise the rights listed below, as provided for by Regulation (EU) 679/2016:

- Right of access to personal data, i.e. the right to obtain confirmation from the Data Controller whether or not personal data is being processed and to obtain information relating to the latter.
- Right to obtain the rectification of inaccurate personal data concerning you without undue delay.
- Right to obtain the erasure of personal data concerning you without undue delay ("right to be forgotten").
- Right to obtain restriction of processing that concerns you.
- Right to object to processing concerning you at any time on grounds relating to your particular situation.
- Right to data portability, i.e. the right to receive personal data concerning you in a structured, commonly used and machine-readable format and to transmit such data to another Controller without hindrance.
- Right to withdraw consent at any time without prejudice to the lawfulness of processing based on consent provided before withdrawal.
- Right to lodge a complaint with the supervisory authority (Privacy Authority).

Data Controller

The Data Controller, which you can contact to exercise the above rights, is Alberto Sassi S.p.A. with registered office in Via Guido Rossa, 1 – Località Crespellano – 40053 Valsamoggia (BO).

The aforementioned rights may also be exercised by you by sending communications to the following e-mail address: privacy@sassi.it.

Authorisations for promotional communications: go to the link [Subscribe Newsletter](#)