

PRIVACY POLICY

In compliance with the provisions of current legislation on the protection of personal data, namely EU Regulation 2016/679 (also called "GDPR") and, where applicable, by national complementary legislation, we would like to inform you about the processing of your personal data by the Controller's organization, which will be guided by the principles of correctness, legality and transparency, as well as the protection of your confidentiality and the protection of your rights. This information is provided for the personal data provided by you (ie the person concerned reading the information), with different modalities including the visit to the website, the conclusion of a contract with the Controller, filling out forms and other ways of collecting data from customers and potential customers.

a) Who is the Data Controller? How do I contact them?

The data controller is **Bondioli & Pavesi S.p.A**, with registered offices in Via 23 Aprile, 35/a I - 46029 SUZZARA (MN), VAT no 01940930207, hereinafter the "Controller". Your contact details are as follows: bp@bondioli-pavesi.com.

b) For what purposes are the data processed? On what legal basis? And how long are they kept?

Below we indicate the purposes of processing, the legal basis that legitimizes the processing and the time of storage of your personal data:

<i>Purpose</i>	<i>Legal basis</i>	<i>Conservation</i>
Contract execution: to conclude a contract and fulfil contractual and pre-contractual obligations, such as financial evaluation, request of documentation attesting the fulfilment of certain requirements, The fulfilment of specific requests before the conclusion of the contract, the normal management of the contract, support and after-sales assistance.	Execution of pre-contractual and contractual obligations	The data will be kept for the period of ordinary prescription of the rights for accounting and/or tax reasons except for the additional retention period provided by law or, in case of litigation, until its conclusion.
Compliance with legal obligations: to comply with the obligations provided by the laws in force, including the maintenance of company accounts for civil and fiscal purposes, acts and obligations directed to the preparation of financial statements, as well as by the provisions of authorities empowered to do so by law.	Compliance with legal requirements	
Administrative/accounting management: to carry out administrative, financial, statistical and accounting operations related to internal organizational needs, as well as for the recovery of debts and in general the protection of rights, also in coordination with the other companies of the group.	Legitimate interest	
Promotion of similar products or services: to allow the Controller to promote and sell directly products or services similar to those you have already purchased, using the e-mail details provided by you in the context of a previous purchase, provided that you do not exercise your right of opposition in <i>the ways</i> described in the paragraph "What are your rights as a data subject?" which follows. You can exercise your right to object by ticking the appropriate box provided or later via the appropriate link at the bottom of any promotional content email that will be sent to you.	Legitimate interest , as provided for in article 13, paragraph 2 of Directive 2009/136/EC.	Personal data may be stored at most until your objection, which may occur at any time.
Direct marketing: to allow the Controller to carry out on his own initiative, without a specific request from him, marketing and promotional activities such as advertising and promotional information, direct sales, market research, surveys to assess the degree of customer satisfaction (customer satisfaction), commercial communications, newsletters and periodicals, carried out on the Controller's initiative, using all available means of communication, automated and non-automated (such as: paper mail, telephone, your e-mail address, sms, social networks and similar) for products and/or services offered by the Data Controller.	Consensus	Personal data may be stored at most until the withdrawal of consent or objection by you, which may occur at any time. If the customer is inactive, after two years the consent will be considered revoked.

c) What is the legitimate interest allowing processing?

As regards the legitimate interest for purposes of **administrative/ accounting** management, it is related to the need to carry out administrative and managerial operations by the Controller, to manage properly and efficiently its operations, and to exercise any rights granted by law, including the recovery of claims, and does not affect the fundamental freedoms and rights of the person concerned. In the case of **Promotion of Products or similar services**, the legitimate interest is to be traced to the desire of the Data Controller to continue business relations with you and to improve its service and keep you updated on developments in the offer.

d) Is it mandatory to provide data? What happens if you do not provide them?

The conferment of data for the purposes of contract execution, compliance with legal obligations and administrative/ accounting management is necessary for the conclusion and management of the contract. In the absence of such partial or total contribution, the contractual relationship and its continuation cannot be started.

For the other purposes, the provision is optional and failure to provide will make it impossible to update our offer but will not affect the conclusion of the contract.

e) Are the data transferred outside the EU?

Given the international nature of our organization, some of your personal data may be transferred abroad to locations outside the European Union. This transfer will be carried out in compliance with the guarantees required by the GDPR for this type of activity (art. 45 to 49). In particular, for example: to companies located in countries where the existence of data protection guarantees comparable to those of the GDPR is recognized (countries with adequacy decisions), or to companies with which specific contractual clauses for the protection of personal data have been signed or binding rules of the company approved by the Garante Authority. For more information, please contact the Data Controller.

f) Who can know your details? To whom shall we communicate them?

The personal data related to the processing in question, for the purposes set out above, may be communicated or disclosed:

- to those within the Data Controller's organisation who need it because of their job or hierarchical position. These subjects are the persons authorised to process data under the direct authority of the Controller;
- Public Administrations, security authorities, inspection and, more generally, subjects whose right to access the data is recognized by specific legal provisions or a measure issued by an authority authorized by law.
- to persons whose activity is necessary for the execution of contracts to which you are a party or for fulfilling requests before the conclusion of the contract (e.g.: companies and institutions in the banking, credit and insurance sector, financial intermediaries, transporters, law firms, etc.) acting as independent controllers;
- to third parties who carry out processing on behalf of the Data Controller, related to the processing and the purposes described above, such as administrative, accounting, tax, information system management services, attendance and payroll management. These subjects are authorized to process them as Data Processors according to the provisions of article 28 of the GDPR;
- Group companies within the EU.

g) What are your rights as a data subject?

The GDPR grants you the following rights in relation to your personal data, which you can exercise within the limits and in accordance with what is provided for by the legislation:

- Right of access to your personal data (Art. 15);
- Right of rectification (art. 16);
- Right to cancellation (right to be forgotten) (art. 17);
- Right to restriction of processing (art. 18);
- Right to data portability (art. 20);
- **Right of opposition (art. 21)**; the data subject has the right to object at any time, for reasons related to his particular situation, to the processing of personal data concerning him based on legitimate interest, including profiling on the basis thereof. The Data Controller shall refrain from processing unless it proves that there are compelling legitimate grounds for processing which prevail over the interests, rights and freedoms of the data subject or for the determination, the exercise or defence of a right in legal proceedings;
- Right to object to a decision based solely on automated processing (art. 22);
- Right to withdraw, at any time, the consent given, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.

You can exercise your rights by sending a written request addressed to the Data Controller at or via e-mail, as indicated above. You also have the right to complain to the Data Protection Authority (www.garanteprivacy.it) if [you](#) believe that the processing of your data is contrary to the applicable legislation (art 77) or to take legal action (art 79).

h) How is personal data protected?

Personal data will be processed either with electronic means or without the aid of electronic means, Using technical and organisational security measures appropriate to the nature of the data to ensure its integrity and confidentiality and protect it against the risks of unlawful intrusion, loss, alteration or disclosure to third parties not authorised to process it.

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