



**INFORMATION ON THE PROCESSING OF PERSONAL DATA OF CUSTOMERS AND SUPPLIERS  
PROCESSING RIGHTS – DISTANCE COMMUNICATIONS TECHNIQUES  
(ARTICLE 13, ARTICLE 14 OF THE EU REGULATION 2016/679)**

Detailed information about the free movement of personal data that we gather and how we use them is one of our priorities. SCILLA MECCANICA SRL is specialized in the production process that, from casting comes to finishing on numerical control machining centers. In case of personal data processing, SCILLA MECCANICA SRL performs the treatment for the purposes defined in this information notice; it follows that, in accordance with Regulation (UE) 2016/679 on the protection of individuals with regard to the processing of personal data, we inform you that your data will be treated as set out below.

**Contacts to which you can ask questions about the treatment**

The data controller is Mr. Franco Bezzi, the company's Chairman of the Board of Directors, who can always be directly contacted and is available to provide the necessary answers to the following address:

**SCILLA MECCANICA S.R.L.,**

Via Borgosatollo n. 1/A, 25016 Ghedi (BS), Cod. Fisc. e P. IVA 03266600174  
www.scillameccanica.it | www.scillameccanica.com | info@scillameccanica.it

**A. GENERAL INFORMATION ON DATA PROCESSING**

**A1 Purpose**

The processing of data has purposes that are connected and necessary for the performance of the service; connected to the fulfillment of obligations under laws, regulations or contract; connected to inform territorial and non-territorial Authorities; in compliance with legal obligations, regulations, EU Regulations; in line with the management of customer relationships; in compliance with administrative, accounting and tax management; in line with the control of reliability and solvency; aimed at managing any contentious matters (debt collection; judicial disputes); aimed at sending communications in general (not of an advertising nature). The data is therefore treated with the intention of pursuing the legitimate interest of the owner and third parties. We also process personal data provided voluntarily. In this case the law basis is point b of Article 6(1) of GDPR. The data processed in this context includes data of customers, employees and suppliers in the manner necessary for the purposes specified in this statement. Insofar as we process your data as described above for the purpose of accepting and processing assistance and warranty claims, appointments and orders, you are contractually bound to provide us with such data, without which processing is not possible. If you have given your consent to your personal data use [point a of Article 6(1) of GDPR], you can revoke it at any time. The revocation of consent shall not affect the legitimacy of processing based on consent until the data of revocation.

**A2 Processing of personal data – Transfer to third parties**

The information provided may also be processed by other legal entities. Such processing shall however take place within the limits justified by the purposes specified in this notice or in accordance with the instructions given by the data controller to the other legal entity acting as service provider/processor.



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In this context we sometimes use service providers who perform data processing on our behalf (design and software development, or to support customer inquiries).

In these cases the information is forwarded to third parties for further processing. External services providers are carefully selected and regularly checked to be sure your privacy is protected. These service providers/processors are bound by contract and are also subject to our requirements, which include the processing of your data exclusively in accordance with our instructions and relevant data protection regulations. In particular, they are contractually bound to processing of data with the utmost confidentiality, and they are forbidden to process the data for purposes other than those agreed upon.

The transfer of data to the data processor takes place in accordance with Article 28(1) of GDPR.

We do not sell your personal information to third parties, nor do we share it for commercial purposes. In addition to the above, we transfer your personal data to judicial authorities and, if applicable, to damaged third parties without your express consent, where this is necessary for legal action.

### **A3 Transfer of data to third countries**

The transfer of data to third countries takes place according to the legal conditions. In particular, where this is the case, the recipients, or categories of recipients, of the personal data will be you notified in accordance with the requirements of the law and in any case in line with the data processing purposes.

### **A4 Security**

SCILLA MECCANICA SRL adopts adequate technical and organizational security measures so that the user's personal data are protected from accidental or intentional manipulation, loss, destruction or access by unauthorized third parties. The above also applies to external services purchased. We verify the effectiveness of the data protection measures adopted, subjecting them to constant improvement in line with technological development.

### **A5 Standard periods for data deletion**

At the end of the periods for which the legislation allows storage, the data is normally deleted. Data that are not affected by the above mentioned periods and storage obligations will be deleted or made anonymous as soon as the purposes defined in this notice have ceased to exist. Unless otherwise specified in this information notice on data retention, they will be retained as long as they are necessary for the purposes for which they were collected.

### **A6 other use of data and deletion of the data**

Any other processing or use of personal data will only be carried out to the extent permitted by law or where the user has given consent for this purpose. In case of further processing for purposes other than those originally indicates for data collection, the user will be informed about these additional services, with all significant data, before further processing.

## **B. RIGHTS REGARDING THE PROCESSING OF PERSONAL DATA**

### **B1 Right of access**

Upon written request, the user has the right to receive information from us about personal data concerning him/her that is processed in accordance with Article 15 of the GDPR. You can send your request by post or e-mail to the above address.



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### **B2 Right of cancellation**

Provided there are legal grounds in accordance with Article 17 of the GDPR, you have the right to have your personal data deleted immediately (the “right to be forgotten”). These legal reasons include: personal data that are no longer necessary for the purposes for which they were processed, or for which the user has revoked consent, and for which there are no other legal reasons for processing. To assert these rights, please contact the above address.

### **B3 Right of rectification**

The user has the right to obtain timely correction of inaccurate personal data concerning him/her (Article 16 of GDPR) by contacting the above address for this purpose.

### **B4 Right of opposition**

Pursuant to Article 21 of the GDPR you have the right to object at any time to the processing of personal data concerning you, except as indicated in points (e) or (f) of Article 6(1) of the GDPR, for reasons related to your particular situation. We will waive the processing of your personal data unless we are able to demonstrate compelling and legitimate reasons that override your interests, rights and freedoms, or unless the processing of confidential data is necessary to establish, exercise or defend a right by judicial means. To assert these rights, please contact the above address.

### **B5 Right of restriction of processing**

The user has the right to the restriction of treatment as stipulated by Article 18 of the GDPR, if the criteria prescribed by the same are met. According to the above mentioned article, the limitation is applicable in particular in case of unlawful processing, if the data subject opposes the deletion of the personal data by requesting instead the limitation of its use or, if the person concerned has opposed the processing in accordance with Article 21(1) of the GDPR, until it is clarified whether our legitimate interests prevail over the interests of the interested party. To assert these rights, please contact the above address.

### **B6 Right to appeal to the supervisory authority**

If you believe that the processing of personal data concerning you, and carried out by us, is unlawful or inadmissible, you have the right to appeal to the competent supervisory authority. This authority is: Garante per la protezione dei dati personali, Piazza di Montecitorio n. 121 00186 - ROMA Tel.: (+39) 06.696771 Fax: (+39) 06.69677.3785 e-mail: garante@gpdp.it

## **C. PERSONAL AND/OR CONTACT DATA FOR TRADE FAIRS, EVENTS, CONFERENCES AND CONVENTIONS**

The Personal Data, the provision of which is necessary for the performance of the relationship, are as follows:

- Name and Surname
- E-mail address
- Company name
- Sector in which the company operates
- Specific interests

In this case, the paper form shall serve as consent form. The data provided on the paper form are transferred to a digital database for the processing of preferences expressed and for sending marketing communications. SCILLA



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MECCANICA SRL collects data exclusively to offer the potential customer information about the sale and services to the same and provided by companies belonging to the SCILLA MECCANICA SRL group that will send periodic free communications to the potential customer for this purpose. The legal reason for processing such data is the consent given by the user. You can revoke your consent at any time via the unsubscribe link at the bottom of the body of our marketing emails. The legal reason for processing this data for this purpose is the legitimate interest of SCILLA MECCANICA SRL to reduce the number of marketing emails sent to each customer by selecting which customers should receive a certain type of marketing emails. With regard to the duration of storage, it is specified that the data provided on paper and electronic forms will be retained until the potential customer decides to cancel their registration.

#### **D. DATA COLLECTED WHEN SENDING COMMERCIAL OFFERS AND/OR QUOTATIONS**

The Personal Data, the provision of which is required for the performance of the relationship, are as follows:

- Name and Surname
- E-mail address
- Company name

##### Legal purpose and grounds

The data are collected for the following purposes strictly related to the establishment and continuation of the relationship:

- Formulation of projects, quotations and rafting of tenders;
- Fulfillment of tax or accounting obligations;
- Fulfillment of contractual obligations;
- Customer management; Customer administration; Administration of contracts; orders; shipments and invoices;
- Litigation management, breach of contract, warnings, settlements, debt recovery, arbitration, court disputes;
- Checks on the reliability and solvency of customers;
- Keeping of records relating to personnel by virtue of their participation in training courses.

These data are processed in order to properly manage offers or supply orders, in accordance with the current legislation. The legal reason for processing this data for this purpose is the legitimate interest of SCILLA MECCANICA SRL to protect its rights and the rights of its customers.

The data, if this is instrumental to the pursuit of the purposes indicated above, may be communicated to:

- banks and credit institutions;
- professional and consulting firms;
- insurance and financial corporation;
- Supervisory bodies such as the Board of Statutory Auditors, Independent Auditors,
- public bodies only where this is required by law.

If the processing involves disclosure, a specific consent will always be required in compliance with the applicable Regulations and rules and, the duration of storage will be consistent with the period provided by law for the purpose of tax compliance.



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## E. DATA COLLECTED IN CONNECTION WITH SUPPLY REQUESTS

SCILLA MECCANICA collects information regarding its suppliers, or potential suppliers, in compliance with current legislation. The Personal Data, the provision of which is necessary for the performance of the relationship, are the following:

- Name and Surname
- E-mail address
- Supplier company name
- VAT number/TAX code
- Account number (IBAN code)

### Legal purpose and grounds

The data are collected for the following purposes strictly related to the establishment and continuation of the relationship:

- Receipt of projects, service quotations, receipt of offers;
- Fulfillment of tax or accounting obligations;
- Fulfillment of contractual obligations;
- Supplier management; supplier administration; administration of contracts, orders, shipments and invoices;
- Litigation management, breach of contract, warnings, transactions, credit notes, arbitrations, legal disputes;
- Checks on the reliability and solvency of suppliers;
- Keeping records of qualified suppliers, certified products.
- Survey of the degree of reliability of suppliers.

The above data are processed in order to correctly manage offers or supply orders, in accordance with the current Regulations. The legal reason for processing this data for this purpose is the legitimate interest of SCILLA MECCANICA SRL to protect its rights and the rights of its suppliers. The data, if this is necessary for the pursuit of the above-mentioned purposes, may be communicated to:

- Banks and credit institutions;
- other compagne in the SCILLA MECCANICA SRL group;
- professional and consultino firms;
- accreditation bodies;
- insurances and financial companies;
- Supervisory bodies such as the Board of Statutory Auditors, Independent Auditors,
- Public bodies (territorial and not territorial) only in cases where this is required by law.

If the processing involves disclosure, a specific consent will always be required in compliance with the applicable Regulations and rules. Also in this case, the data will be kept for the period required by law also for tax purposes.

Ghedi (Bs), December 2018

Scilla Meccanica Srl



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