



S.A.I.E. s.r.l.
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INFORMATION NOTE OF CUSTOMER AND SUPPLIER PERSONAL DATA PROCESSING
(n. 2016/679, c.d. GDPR)

S.A.I.E. S.r.l., with registered office in Piacenza (PC), Via Portapuglia n. 29, as Data Controller of Personal Data, pursuant to and for the effects of Regulation (EU) 2016/679 (hereinafter "GDPR"), hereby informs you that the aforementioned legislation provides for the protection of data subjects with respect to the processing of personal data and that such processing will be based on the rights of correctness, lawfulness, transparency and protection of your confidentiality and your rights.

Personal data will be processed in accordance with the provisions of the aforementioned legislation and the confidentiality requirements set out therein.

Identity and contact details of the Data Controller

The data controller is S.A.I.E. S.r.l., with registered office in Piacenza (PC), Via Portapuglia n. 29, tel. +39.0523.592180, fax +39.0523.579071, e-mail: saiesrl@pec.saiepiacenza.com

Purpose of the processing for which the personal data are intended as well as the legal basis of the processing

As Data Controller inform that the personal data is of our possession, collected directly from the interested party, or from third parties, may be processed for the following purposes:

1. Provide the requested services and manage relationships:
 - a) Pre-contractual negotiations, including the acquisition of all useful and / or necessary information for the stipulation of the contract, also in relation to credit risk mitigation needs.
 - b) Execution of contractual obligation deriving from the contract itself and management of relationships such as, by way of example, accounting management, administration, management of payment or collection systems, checks and assessment of the progress of relations and risks connected, for insurance.
The provision of personal data necessary for these purposes is not mandatory, but the refusal to provide them may involve - in relation to the relationship between the data and the service requested - the impossibility of S.A.I.E. S.r.l. to provide the service itself. Their treatment does not require the consent of the interested party.
2. Fulfill the requirements dictated by laws, regulations and community legislation (for example: anti-money laundering, tax and tax assessments), as well as provisions issued by Authorities legitimated by law and by Supervisory and Control Bodies (for example, central risks, Supervisory Reports).
The provision of personal data necessary for these purposes is mandatory and its processing does not require the consent of the interested parties.
3. S.A.I.E. S.r.l. processes your personal data within the category "Categories of personal data" (political opinions, judicial crimes) within the limits strictly necessary for the management of your relationship to be finalized or in progress. These data can only be processed with your consent. We, reiterate that without your consent S.A.I.E. S.r.l. cannot manage those relationships that imply knowledge of such data.
S.A.I.E. S.r.l. as data controller, in the event that it intends to process personal data for a purpose other than that for which they have been collected, before such further processing will provide the interested party with information regarding this different purpose.

Recipients or categories of recipients of personal data

For the pursuit of the aforementioned purposes, S.A.I.E. S.r.l. needs to communicate the personal data of the interested party in his possession:

1. Directors and Control Bodies of S.A.I.E. S.r.l. ;
2. Employees of S.A.I.E. S.r.l. ;
3. Financial agents with whom S.A.I.E. S.r.l. maintains mandate relationships;
4. Supervisory and Control Bodies in fulfillment of an obligation established by law, by a regulation or by community legislation;
5. Public Authority;
6. Financial intermediaries and / or banks with whom S.A.I.E. S.r.l. has intercourse;
7. Service providers for purposes strictly connected and structural to the management of relationships, consultants, auditors and other consultants legal, fiscal and administrative of S.A.I.E. S.r.l. for purposes related to the performance of the consultancy services provided;
8. employees of external companies appointed as directors and in charge of IT systems;
9. subsidiaries, associates, investee companies of S.A.I.E. S.r.l. .

The updated list of individuals identified as internal and external "Data Processors" is available at the Company's headquarters.

Transfer of data to foreign / external countries

If S.A.I.E. S.r.l. intended to transfer personal data to a third country or an international organization, S.A.I.E. S.r.l. will have to provide for integrate existing procedures in order to comply with the provisions of Chapter V of EU Regulation 2016/679. The transfer of data to foreign countries is admitted if the Commission has decided that the third country, a territory or one or more specific sectors within the third country, or the organization international level in question ensure an adequate level of protection.

Retention period of personal data and criteria used to determine this period

According to Art. 5 letter e) personal data are stored using manual and / or IT tools that allow the identification of data subjects for a period of time not exceeding the achievement of the purposes for which they are processed. The retention period of personal data is limited to the minimum necessary in compliance with the 231/2007 legislation on anti-money laundering (10 years), tax legislation (10 years) and legislation on work (5 years).

Rights of the interested party

The interested party can assert the rights referred to in Articles 15-22 of the EU Regulation, namely: the right of access, of rectification and the right of cancellation ("Right to be forgotten") of the same, the right to limit their processing, the right to data portability, the right to object to processing, reported for the purpose of greater transparency at the bottom of the following information.

Requests made in exercising these rights must be sent to S.A.I.E. S.r.l., with registered office in Piacenza (PC), Via Portapuglia n. 29, tel. +39.0523.592180, fax +39.0523.579071, e-mail: saiesrl@pec.saiepiacenza.com

Privacy Guarantor Complaint

According to art. 77 the interested party, who deems that the treatment concerning him or her violates this regulation, has the right to lodge a complaint before the Privacy Authority, which can be contacted at the website <http://www.garanteprivacy.it/>.

S.A.I.E. S.r.l. as data controller, it is required to provide the interested party pursuant to art. 14 of the EU Provision 2016/679, if the data personal data have not been obtained from the data subject, at the time the personal data are obtained, the following additional information:



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Categories of Personal Data

Below is a detail of the personal data processed by S.A.I.E. S.r.l.:

- Name and Surname of the person concerned
- Tax Code of the interested party
- Location data
- Economic data of the interested party
- Political opinions if Politically Exposed Person (in compliance of the obligations regarding Anti-Money Laundering - Legislative Decree 231/2007 and subsequent amendments)
- Criminal convictions and offenses (in compliance of the obligations regarding anti-money laundering - Legislative Decree 231/2007 and subsequent amendments)
- Data acquired from curriculum vitae

Source from which Personal Data originates - Art. 14 paragraph 2 point f)

S.A.I.E. S.r.l. as data controller, it is required to provide the interested party according to art. 14 of the EU Provision 2016/679, if the data personal data have not been obtained from the data subject, the source from which the personal data originates, the following additional information:

- Legal Representative of the Client
- Sources accessible to the public (Chamber of Commerce searches)

Please note that according to Article 14 paragraph 3, in the case of data collection from a third party, the data controller provides the data subject with the information:

- a) within a reasonable period of obtaining the personal data, and in any case within one month;
- b) in the event that the personal data are intended for communication with the interested party, at the latest at the time of the first communication to the interested party;
- c) if communication to another recipient is envisaged, no later than the first communication of personal data.

Rights of the interested party - EU Regulation 2016/679

Right of access by the interested party - Art. 15

The interested party has the right to obtain from the data controller confirmation as to whether or not personal data concerning him is being processed and, in this case, to obtain access to personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data in question;
- c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if they are recipients of third countries or international organizations;
- d) when possible, the retention period of the personal data provided or, if not possible, the criteria used to determine this period;
- e) the existence of the interested party's right to ask the data controller to rectify or delete personal data or the limitation of the processing of personal data concerning him or to oppose their treatment;
- f) the right to lodge a complaint with a supervisory authority;
- g) if data are not collected from the interested party, all information available on their origin;
- h) the existence of an automated decision-making process, including profiling referred to in Article 22, paragraphs 1 and 4, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such processing for the interested party.

Furthermore, if personal data are transferred to a third country or to an international organization, the interested party has the right to be informed of the existence of guarantees adequate according to Article 46 relating to the transfer. The data controller provides a copy of the personal data being processed. In case of further copies requested by the interested party, the data controller can charge a reasonable fee based on administrative costs. If the interested party submits the request by electronic means, and unless otherwise indicated of the interested party, the information is provided in a commonly used electronic format. The right to obtain a copy referred to in paragraph 3 must not affect the rights and freedom of others.

Right of rectification - Art. 16

The interested party has the right to obtain from the data controller the correction of inaccurate personal data concerning him without unjustified delay. Taking into account the purposes of the processing, the interested party has the right to obtain the integration of incomplete personal data, also by providing an additional declaration.

Right to cancellation ("right to be forgotten") - Art. 17

1. The interested party has the right to obtain from the data controller the cancellation of personal data concerning him without undue delay and the data controller has the obligation to delete personal data without unjustified delay, if one of the following reasons exists:

- a) the personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;
- b) the interested party revokes the consent on which the processing is based in accordance with Article 6, paragraph 1, letter a), or Article 9, paragraph 2, letter a), and if there is no other legal basis for the processing;
- c) the interested party opposes the processing pursuant to Article 21, paragraph 1, and there is no legitimate overriding reason to proceed with the processing, or opposes the processing to pursuant to Article 21, paragraph 2;
- d) the personal data have been unlawfully processed;
- e) personal data must be deleted to comply a legal obligation under the law of the Union or of the Member State to which the data controller is subject;
- f) the personal data have been collected in relation to the company's service offer of the information referred to in Article 8, paragraph 1.

2. The data controller, if he has made personal data public and is obliged, according to paragraph 1, to delete them, taking into account the available technology and the costs of implementation takes reasonable measures, including technical ones, to inform the data controllers who are processing personal data of the interested party's request to cancel any link, copy or reproduction of your personal data.

3. Paragraphs 1 and 2 do not apply to the extent that processing is necessary:

- a) for the exercise of the right to freedom of expression and information;
- b) for the compliance of a legal obligation that requires the treatment required by EU law or of the Member State to which the data controller is subject or for the performance of a task carried out in the public interest or in the exercise of public authority of which it is invested the data controller;
- c) for reasons of public interest in the public health sector in accordance with Article 9, paragraph 2, letters h) and i), and Article 9, paragraph 3;
- d) for archiving purposes in the public interest, for scientific or historical research or for statistical purposes in accordance with Article 89, paragraph 1, to the extent that the right referred to in paragraph 1 is likely to make it impossible or seriously prejudice the achievement of the objectives of such processing;
- e) for the assessment, the exercise or the defense of a right in court.



Right to limitation of treatment - Art. 18

1. The interested party has the right to obtain from the data controller the limitation of processing when one of the following hypotheses occurs:
a) the data subject disputes the accuracy of personal data, for the period necessary for the data controller to verify the accuracy of such personal data; b) the processing is unlawful and the interested party opposes the cancellation of personal data and instead requests that its use be limited; c) although the data controller no longer needs it for the purposes of processing, personal data are necessary for the data subject to ascertain, exercise or defend a right in court; d) the interested party opposed the processing pursuant to Article 21, paragraph 1, pending verification of the possible prevalence of the legitimate reasons of the data controller with respect to those of the interested party.
2. If the processing is limited according to paragraph 1, such personal data are processed, except for storage, only with the consent of the interested party or for the assessment, exercise or defense of a right in court or to protect the rights of another natural or legal person or for reasons of significant public interest of the Union or of a Member State.
3. The interested party who has obtained the processing limitation in compliance to paragraph 1 is informed by the data controller before this limitation is revoked

Obligation to notify in case of rectification or cancellation of personal data or limitation of processing - Art. 19

The data controller communicates to each of the recipients to whom the personal data have been transmitted any corrections or cancellations or limitations of the processing carried out pursuant to Article 16, Article 17, paragraph 1, and Article 18, unless this is the case proves impossible or involves a disproportionate effort. The data controller informs the data subject of these recipients if the data subject requests it.

Right to data portability - Art. 20

1. The interested party has the right to receive in a structured format, commonly used and readable by an automatic device, the personal data concerning him provided to a data controller and has the right to transmit such data to another data controller without impediments on the part of the data controller to whom he provided them if:
a) the processing is based on consent according to Article 6, paragraph 1, letter a), or Article 9, paragraph 2, letter a), or on a contract according to Article 6, paragraph 1, letter b); and b) the processing is carried out by automated means.
2. In exercising their rights relating to data portability in accordance with paragraph 1, the interested party has the right to obtain the direct transmission of personal data from one data controller to the other, if technically feasible.
3. The exercise of the right referred to in paragraph 1 of this article is without prejudice to Article 17. This right does not apply to the processing necessary for the performance of a task in the public interest or connected to the exercise of public authority referred to the data controller is invested.
4. The right referred to in paragraph 1 must not affect the rights and freedoms of others.

Right to object - Article 21

1. The interested party has the right to object at any time, for reasons connected to his particular situation, to the processing of personal data concerning according to article 6, paragraph 1, letters e) or f), including profiling on the basis of these provisions. The data controller refrains from further processing personal data unless he demonstrates the existence of compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the data subject or for the assessment, exercise or the defense of a right in court.
2. If personal data are processed for direct marketing purposes, the interested party has the right to object at any time to the processing of personal data concerning him for these purposes, including profiling to the extent that it is connected to such marketing. direct.
3. If the interested party objects to the processing for direct marketing purposes, the personal data are no longer processed for these purposes.
4. The right referred to in paragraphs 1 and 2 is expressly brought to the attention of the interested party and is presented separately from any other information at the latest at the time of the first communication with the interested party.
5. In the context of the use of information society services and without prejudice to Directive 2002/58 / EC, the interested party may exercise his right to object by automated means using specific techniques.
6. If personal data are processed for scientific or historical research purposes or for statistical purposes according to Article 89, paragraph 1, the interested party, for reasons connected to each particular situation, has the right to object to the processing of personal data that concerns, except if the processing is necessary for the execution of a public interest commitment.

Automated decision-making process relating to natural persons, including profiling - Article 22

1. The interested party has the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or which significantly affects his person in a similar way.
2. Paragraph 1 does not apply if the decision:
a) is necessary for the conclusion or execution of a contract between the data subject and a data controller; b) is authorized by the law of the Union or of the Member State to which the data controller is subject, which also specifies appropriate measures to protect the rights, freedoms and legitimate interests of the data subject; c) is based on the explicit consent of the interested party.
3. In the cases referred to in paragraph 2, letters a) and c), the data controller implements appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, at least the right to obtain human intervention by the data controller of the processing, to express their opinion and to contest the decision.
4. The decisions referred to in paragraph 2 shall not be based on the special categories of personal data referred to in Article 9 (1), unless Article 9 (2) (a) or (g) applies, and there are no adequate measures in place to protect the rights, freedoms and legitimate interests of the data subject.