



ELCO GROUP S.p.A.
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INFORMATION DOCUMENT CLIENTS

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for clients pursuant to articles 13 and 14 of the Regulation (UE) 2016/679
of the European Parliament and Council dated 27 April 2016

Pursuant to article 13 of the General Data Protection Regulation - Regulation (UE) 2016/679 of the European Parliament and Council dated 27 April 2016 relating to the protection of natural persons with regard to the processing of personal data and the free movement of such data (hereafter "**GDPR**"), and our attention in furnishing you information related to the processing of personal data supplied by you for aims of the relationship with ELCO GROUP S.p.A.

Data Controller
The Data Controller is ELCO GROUP. S.p.A. with registered offices at Carsoli (AQ), Via Turanense Km 44,829 , tax code: 08059240583 (hereafter " Controller " or " Company ") being part of the "ELCO Group" (MAGICA S.R.L., ELCO S.P.A., ELCO SUN S.R.L., ADX DIGITAL STUDIO S.R.L, ELCOPCBONLINE S.R.L., ELCO EUROPE, ELCO PCB B.V., Ramaer Equipment, CIQE Sarl, Elco Germany Gmbh, Elco PCB SA).
Data Protection Officer (hereafter "RPD" or "DPO")
The contact data for the DPO is available on the Data Controller's web site or from the registered offices. In order to exercise your rights, and for all communications, problems and/or requests for clarifications regarding the protection of your personal data, you are free to contact the DPO Team of Magica S.R.L., in the person of Dr. Paolo Franco and Dr. Luca Righetti, at the address privacy@elco-group.com

Obligatory purposes for which processing does not require your consent

Purposes	Legal basis for processing
Managing the execution of pre-contractual measures, as well as carrying out the fulfilment of reciprocally accepted contractual obligations	(Article 6, para 1, sub-para b, GDPR) Fulfilment of a contract
Statistics and credit protection	(Article 6, para 1, sub-para c, GDPR) Processing necessary for fulfilling a legal obligation to which the data controller is subject (Article 6, para 1, sub-para f, GDPR) Processing necessary for pursuance of the legitimate interests of the data controller connected with the organisational, administrative, financial and accounting management of his organisation
Managing the archiving and preservation of data, information, communications, even electronically, and documents regarding the commercial relationship	(Article 6, para 1, sub-para c, GDPR) Processing necessary for fulfilling a legal obligation to which the data controller is subject

Discretionary purposes for which processing requires your consent

Purposes	Legal basis for processing
Commercial and direct marketing through the transmission to the email addresses supplied by you of communications regarding the sale of products and/or services similar to those possibly already supplied	(Article 6, para 1, sub-para f, GDPR) Processing necessary for pursuance of the legitimate interests of the data controller connected with the organisational and commercial management of his organisation

Addressees of personal data

For pursuance of the above-mentioned aims, your personal data could be communicated to:

- Employees and/or colleagues of the data controller, duly nominated as persons authorised and trained on the manner of processing such data;
- other companies of the ELCO Group for the management of specific functions and/or services;
- third parties differing from the data controller, such as:

Third party persons or categories	Purposes	Notes
Computer companies	Management, maintenance and updating of systems and software used by the data controller, as well as video-surveillance and geo-location systems	Nomination as Data Processor (article 28, GDPR). Information held by the DPO
Suppliers of networks, electronic communications services, computer and electronic archiving services, preservation and computer management of data	Hosting, housing, Cloud, SaaS and other indispensable remote computer services for the provision of the data controller's activities; regulatory archiving and preservation activities of electronic documents	Nomination as Data Processor (article 28, GDPR). Cloud services could involve processing of data in countries outside the EU which guarantee suitable confidentiality rights. Information held by the DPO
Consultants, professionals, legal offices, arbitrators, insurance, consultants, brokers	Judicial and non-judicial activities, those for insurance against accidents, Organisational, administrative, financial and accounting	Nomination as Data Processor (article 28, GDPR). Information held by the DPO
Banks or institutes, companies and bodies of any type who carry out banking, credit, leasing, factoring and financial activities - even as intermediaries - and pertinent, complementary or similar activities	Organisational, administrative and financial management	
Public Safety Authorities and Legal Authorities	Management of investigations by enquiry agents in the event of accidents	

The companies of the ELCO Group and third parties to whom your personal data might be communicated act as:

- Data controllers, or persons determining the purposes and means of processing personal data;
- data processors, or persons who process personal data on behalf of the data controller;
- joint processing controllers who determine the purposes and means of the same, jointly with the company.

The list of, and the updated information on, the individuals identified as data controllers, processor or joint controllers is available from the company.

Period of preservation of personal data

We note below, the statement on the period of preservation of personal data or, if not possible, the criteria used for determining the period.

Personal data and documents	Period of preservation, or criteria for determining it
Records and documents relating to the contractual relationship	For the necessary duration of pursuing the purposes of processing and also, subsequently, within the limits allowed in law, for administrative and accounting purposes, in addition to validating or safeguarding the rights of the controller, where necessary

Rights of the interested party

We inform you of the existence of a number of rights set out in the GDPR relating to personal data and related processing, which you may request of the data controller.

Right	Description	Manner of making it effective
Right of access to the data (article 15)	You may request: a) The purpose of the processing; b) the category of personal data in question; c) the addressees or the category of addressee to which the personal data have been or are to be communicated, in particular if the addressees are of third party countries or international organisations; d) where possible, the forecast period of preservation of the personal data or, if not possible, the criteria for determining such period; e) the existence of the right of the interested party to require of the Data Controller the correction or cancellation of personal data, or the limiting of processing of personal data concerning him or her, or to oppose its processing; f) the right to lodge a complaint to a supervisory body; g) should the data not have been supplied by the interested party, all the available information on its origin; h) the existence of an automated decision making process, including the profiling as set out in article 22, paras 1 and 4, and in such cases at least, significant information on the logic used, as well as the importance and consequences to the interested party of such treatment. You have the right to request a copy of the personal data, subject of processing	Privacy portal for the exercising of rights. Forms on the web site
The right to correction (article 16)	You have the right to request a correction of incorrect personal data which concerns you and of obtaining the integration of incomplete personal data.	privacy portal for the exercising of rights Forms on the web site
Right to be forgotten (article 17)	You have the right to obtain the cancellation of personal data concerning you from the data controller if the personal data is no longer necessary with regard to the purpose for which it was gathered or otherwise processed	Privacy portal for the exercising of rights. Forms on the web site
Right to limitations on processing (article 18)	You have the right to obtain from the data controller limitations to the processing on contesting the exactness of the personal data (for the period necessary to the data controller to verify the exactness of the said personal data) or, if the processing is unlawful but you oppose the cancellation of the personal data and request that its use is limited, or if required by you for confirming, implementing or defending the right to address the matter in law while they may no longer be necessary to the data controller.	Privacy portal for the exercising of rights. Forms on the web site
Right to data portability (article 20)	You have the right to receive the personal data regarding you in a structured format, of common use and legible on automatic devices, and have the right to transmit it to other data controllers if the processing: (i) is based on the agreement (ii) or the contract and (iii) if the processing is carried out by automated means, with the exception that the processing is necessary for execution of a duty of public interest or connected with the exercising of public powers and that such a transmission does not impinge on the rights of a third party.	The right is implemented by opening a suitable action with the DPO
Right to objection (article 21)	You have, at any time, the right to oppose the processing of your personal data for direct marketing purposes. In such a case, the personal data will no longer be subject to processing for such purposes.	privacy portal for the exercising of rights Forms on the web site
Right to address the Italian Data Protection Agency	You have the right to lodge a complaint with the Supervisory Authority should you consider that the processing concerning you violates the GDPR.	

The exercising of the above-mentioned rights is subordinate to the limits, the rules and procedures set out in the GDPR and which the interested party must know and implement. Furthermore, along with the provisions of article 12, para 3, the data controller will supply the interested party with the information relating to the action taken without unjustified delay and, in any case, not later than one month from receipt of the said request. If necessary that period may be extended to two months, depending on the complexity and number of requests. The Data Controller will inform the interested party of such a delay, along with the reasons for it, within one month of receipt of the request.



The personal data submitted may be processed by the data controller with or without the use of computer facilities.

Furthermore, we inform you that the communication of your personal data is a legal or contractual obligation, or a necessary requirement for executing contractual obligations, for which you are obliged to supply the personal data.

DECLARATION

To having had vision and receipt of the information document:

DATE SIGNATURE

NAME	SURNAME

With my signature at the foot of this document in the capacity of an interested party:

- I commit to consign a copy of this information document to all individuals, Natural persons, involved in the activity of processing by effect of the contract with the company (such as, for example, relatives, cohabitants, contacts, etc.) pursuant to the provisions of article 14 of the GDPR;
- I declare to having obtained from the subjects as described in the previous sub-para, permission for processing their data by the data controller, or the joint controllers and the Data Processor for the aims described above.

DATE SIGNATURE