

**INFORMATION DOCUMENT PROVIDERS**

pursuant to article 13 of 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 " <b>Controller</b> " or " <b>Company</b> ") 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 <a href="mailto:privacy@elco-group.com">privacy@elco-group.com</a>

**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
Obligations regarding administration, accounting and tax; statistical requirements; management of disputes and credit protection.	(Article 6, para 1, sub-para b, GDPR) Fulfilment of a contract (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 pursuing the legitimate interests of the data controller connected with the Organisational, administrative, financial and accounting management of its Organisation
Managing the archiving and preservation of data, information, communications, even electronically, and documents regarding the relationship with the Company.	(Article 6, para 1, sub-para c, GDPR) Processing necessary for fulfilling a legal obligation to which the data controller is subject

**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, updating of systems and software used by the data controller	Nomination as Data Processor (article 28, GDPR).
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, Standard Contractual Clauses.
Consultants, professionals, legal offices, arbiters, insurance, consultants, brokers; other suppliers of services connected with the activities of clients/suppliers	Judicial and non-judicial activities, those for insurance against accidents, Organisational, administrative, financial and accounting management	Nomination as Data Processor (article 28, GDPR).
Banks or institutes, companies and bodies of any type who carry out banking, credit, leasing, factoring and financial activities - even intermediating - and pertinent, complementary or similar activities	Organisational, administrative and financial management	
Public Administrations and public bodies in general	Management of requests by supervisory bodies	
Public Safety Authorities and Legal Authorities	Management of investigations by enquiry agencies 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 at 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 the criteria for determining it.
Personal records and documents related 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, accounting and tax 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.

<b>Right</b>	<b>Description</b>	<b>Manner of making it effective</b>
Right of access to the data (article 15)	You may request: a) the purpose of the processing; b) the categories of personal data in question; c) the addressees or the categories of addressee to which the personal data has been, or will be, communicated, in particular if the addressees are of third party countries or international organisations; d) where possible, the forecast period of preservation of personal data or, if that is not possible, the criteria used to determine such a period; e) the existence of the interested party's right to require of the Data Controller the correction or cancellation of personal data or a limitation on the processing of personal data which concerns you or of which you oppose the processing; f) the right to place a complaint with a supervisory authority; g) whenever the data has not been gathered from the interested person, all the available information on its source; h) the existence of an automated decisional process, including the profiling referred to in article 22, paras 1 and 4, and, at least in such cases, significant information on the logic used, as well as the importance and the consequences foreseen on such processing for the interested party. You have the right to request a copy of the personal data, subject of processing	Forms available on the data controller's 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.	Forms available on the data controller's web site
Right of erasure (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	Forms available on the data controller's 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 it may no longer be necessary to the data controller.	Forms available on the data controller's 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) the contract and (iii) if the processing is carried out with automated means, with the exception that the processing is necessary for execution of a duty of public interest or connected with the execution of public powers and that the said transmission does not affect	Forms available on the data controller's web site
Right to objection (article 21)	You have the right, at any moment, to object, as a whole or in part, to the processing of your data whenever the processing is carried out for the pursuance of a legitimate interest of the data controller, or when the processing is carried out for direct marketing aims. in such a case, the personal data will no longer be subject to processing for such purposes	Forms available on the data controller's website
Right to lodge a complaint with the Supervisory Authority (article 77)	You have the right to lodge a complaint with the Supervisory Authority whenever 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.

### **Amendments and updates**

This information document may be subject to amendments and/or integration, even as a consequence of the applicability of the GDPR, and of any future regulatory amendments and/or updates. The updated information document is available at any time on the data controller's website.

\*\*\*\*\*

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 for the obligatory purposes indicated is a legal or contractual obligation, or a necessary requirement for the execution of contractual obligations, for which, you are required to furnish the personal data as, failing that, it will not be possible to manage the relationship with the Company.