

# **PRIVACY INFORMATION**

# (only natural persons)

In accordance with regulation (UE) 2016/679 ("GDPR"),

FINBETA SPA (hereafter also "Company" or "Data Controller") provides the information concerningthe Company policy about the protection of personal data collected and processed to fulfill thebusinessactivitiesinvolvingcustomersandsuppliers.

## FINBETA SPA may process Your personal data for the following purposes:

**1. without consent** in respect of G.D.P.R. 2016/679/UE to fulfill the contract agreements and on the Controller's legitimate interest in running its business

- to enter into contracts for the supply (in case of customers) or the purchase (in case of suppliers) of services and/or goods;

- to meet the pre-contractual, contractual, tax and accounting obligations arising from existing commercial agreements

- to observe rules and obligations established by Italian or EU legal provisions;

- to exercise the Data Controller's rights of defense in Court;

- for credit management, also by transferring data to debt recovery and collection professional Companies;

### 2. Processing based on consent

- for marketing, market research and profiling purposes, it is anyhow to stress that these aims are not currently pursued and they will be duly announced whenever necessary

### 3. Data protection and retention

Personal Data you provide will be treated lawfully, safely and confidentially. Personal Data will be processed and stored by meeting the needs of adequacy, relevance and limited to what is necessary for the purpose. Data will be kept as long as established by legal obligations to keep the data for a fixed period of time (for example national labour, tax or anti-fraud laws requiring the Company to keep personal data about employees for a defined period which is ten years).

# 4. Access to personal data and categories of recipients

Your personal data might be disclosed to:

- Data Controller's employees and collaborators authorized by Data controller either directly or through nominees, subjects in charge of processing data to fulfill their business activities , in their capacity as persons or outsourced companies and/or system administrators carrying out services on behalf of FINBETA SPA.

- third parties as external data processors ( for example debt recovery and collection professional Agencies, Advisors and freelance cooperators, municipal and national authorities, credit institutions, insurance companies and so on). In case of need you may ask for third party contact list.

# 5. Data Communication

For the purposes mentioned in paragraph 1 the Data Controller may communicate without consent your data to supervisory authorities, judicial authorities, as well as to the subjects to whom the communication is laid down by law. These subjects will process the data in their capacity as independent data controllers.

Your information will not be disclosed.

## 6. Data transfer

No data transfers to third countries or international organizations are carried out.

## 7. Rights of the data subject

Under the General Data Protection Regulation (GDPR) in relation to the information that Finbeta holds about your personal data you have the following rights according to art. 15 :

I. to obtain information on data collected and receive them in an intelligible form ;

II. to obtain indication about: a) the source of the personal data; b) the purposes and manner of the processing; c) the logic applied in case of processing with the aid of electronic instruments; d) the Data Controller's name and contact details, the controller's representative in accordance with art 3, comma 1, GDPR and the persons in charge; e) the recipients or categories of recipients to whom the personal data have been or will be communicated ;

III. to have upon request : a) data updated, corrected or completed; b) data deleted, anonymised or blocked in case of law violating data processing, comprising the ones which don't need to be stored for purposes for which they were collected or processed; c) statement that operations named at paragraph II items a) and b) have been brought to knowledge of the ones who received and spread data, except when this fulfilment is impossible or needs resources exceeding the protected rights

IV. to object to data processing or restrict it: a) for legitimate reasons for processing your personal data;

V. to withdraw consent if the subject has given prior consent for processing personal data for one or more specific purposes;

VI. as well as the Right to rectification, Right to erasure ('right to be forgotten'), Right to restriction of processing, Right to data portability, Right to object, Right to lodge a complaint with a supervisory authority.

## 7. How to exercise rights ex art 12 GDPR

Your rights can be exercised at any time by sending:

a registered letter with return receipt to the following address

FINBETA S.P.A., Via Nazionale Piemonte 4/4, 17100 Savona

Or an e-mail to:

e-mail: administration@FINBETA.com

PEC: postacertificata@pec.finbeta.com

### 8. Persons in charge

The updated list of persons in charge of processing is kept at the Data Controller headquarters and can be asked at the above addresses. Preliminary information or request may be got at the following contacts:

Tel.: +39 019 833111

Fax: +39 019 820880