






**INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA
RELATED TO CONTRACTS WITH CUSTOMERS
IN ACCORDANCE WITH EU REGULATION 2016/679 (“GDPR”)**


	DATA CONTROLLER	C.I.A.M S.p.A. with registered office in Montecchio Emilia (RE) via L. Galvani, 8-8/a – 42027 - Italy VAT number: IT00611500356 Tax Code: 00611500356 e-mail: gdpr@cobogroup.net (“Company” or “Controller”).
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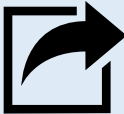
	PERSONAL DATA PROCESSED and SOURCE OF DATA The term “Data” includes data relating to natural persons processed by the Company for the conclusion and execution of the contractual relationship with its customers/clients who are legal persons, or natural persons (“Customers”), such as those of the legal representative who signs the contract in the name and on behalf of the Customer, as well as of the Customer's employees/consultants, involved in the activities referred to in the contract.
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	DATA PROCESSING PURPOSES		LEGAL BASIS FOR PROCESSING DATA		DATA RETENTION PERIOD
	Purposes relating to establishing and executing the contractual relationship between the Customer and the Company.		Execution of the contract for the Data of the legal representative or the natural person Customer. Legitimate interest for the Data of the Customer's employees/consultants involved in the activities under the contract.		For the duration of the contractual relationship and, after termination, up to a maximum of 10 years.
	To fulfill administration-accounting requirements, such as accounts and treasury management, invoicing (e.g. logging and checking invoices) in accordance with legislation.		Requirement to meet the Company's legal obligations.		
	Out-of-court debt recovery		Legitimate interest.		For the duration of the debt collection action.
	If necessary to ascertain, exercise and/or safeguard Controller rights in legal proceedings.		Legitimate interest.		For the duration of any legal disputes until completion of the terms of implementation outlined in legal remedies.
	Marketing purposes (sending commercial/promotional communications), through automated contact methods (such as e-mail, SMS or MMS) and traditional methods (such as telephone calls with operator and traditional mail) on the Company's products/services, customer satisfaction surveys, market research and statistical analysis.		Customer or legal representative's consent (optional and revocable at any time).		Registry and contact data: until consent is revoked. Purchase detail data: 24 months after the collection of each data item.


Once the aforementioned retention period has lapsed the data will be destroyed or made anonymous compatibly with


technical erasure and backup procedures.

	DATA PROVISION
	Data must be provided to agree and execute the contract. Refusing to provide Data therefore means that it will not be possible to establish the contractual relationship and/or fulfil the resulting contractual obligations. The provision of Data is optional and revocable at any time regarding direct marketing activities. In the event that the data subject does not give his/her consent to the processing, he/she will still be able to take advantage of the products and services offered by the Controller.

	DATA RECIPIENTS
	Data may be communicated to external parties operating as data controllers , for example supervisory bodies and authorities and public or private parties in general authorized to request data. Data may be processed on behalf of the data controller by external parties appointed as data processors carrying out specific activities for the controller, such as dealing with accounting, tax and insurance requirements, sending correspondence, managing takings and payments etc.

	PARTIES AUTHORIZED TO PROCESS DATA
	Data may be processed by employees in company departments who are responsible for carrying out the activities outlined above and have been authorized to process the data and have received suitable operating instructions.

	PERSONAL DATA TRANSFERS OUTSIDE THE EU
	Data will not be transferred to entities established in third countries, i.e., outside the European Union and the European Economic Area.


	DATA SUBJECTS' RIGHTS- COMPLAINT TO THE SUPERVISORY AUTHORITY
	By contacting the Company by post to the address via Tito Speri, n. 10, 25024 - Leno (BS) – Italy – or via e-mail sent to gdpr@cobogroup.net , data subjects can ask the Company for access to personal data, or the correction or deletion of personal data, and also have the right to restrict processing ¹ of the data in the cases set out in article 18 of the GDPR, and object to processing in the case of legitimate interests of the controller. Furthermore, in the case where processing is based on consent or a contract and carried out with automated tools, data subjects have the right to receive the personal data in a structured, commonly used and machine-readable format, and to transmit the data to another data controller without obstruction.


¹ What is the right of restriction?

It is the temporary processing of data which consists of **data conservation only**, in the following cases:

- The data subject contests the accuracy of his/her personal data, for the time necessary for the controller to verify the accuracy;
- The processing is unlawful because the data subject is against his/her data erasure and requests the restriction of their use;
- The data controller no longer needs the personal data but data subject needs his/her data for court proceedings purposes;
- The data subject objects to the processing pursuant to art. 21.1 pending the verification whether the legitimate grounds of the controller override his/her legitimate grounds.

	Data subjects have the right to lodge a complaint to the competent Supervisory Authority in the member state where they are resident or where they work, or the member state where the alleged breach took place.
	Data subjects have the right to withdraw his consents at any time expressed for the marketing and/or profiling purposes, furthermore, to object the processing for the marketing purpose including the profiling linked with direct marketing. It is understood that data subjects who prefer to get contacted for the abovementioned purpose through traditional forms of communications, to express their objections to automated communications only.

	INFORMATION NOTICE ACKNOWLEDGEMENT
	<p>By signing this document, I declare that I have received and read the privacy notice and undertake to provide it to the employees/consultants of the company I represent.</p> <p>Place _____, date __/__/____</p> <p style="text-align: right;">Stamp and signature _____</p>

	DATA SUBJECT DECLARATION OF CONSENT	
	<p>I _____, having read the aforementioned privacy notice, and in the knowledge that my consent is optional and can be withdrawn at any time, I hereby give my consent as legal representative of the Customer to my Data being processed by the Controller, for the aforementioned marketing purposes i.e. sending business/promotional communication via automatic contact methods (e.g. e-mail, SMS or MMS) or conventional methods (e.g. by post and telephone calls with operators) about C.O.B.O. S.p.A. products/services, notification of company events, market research and statistical analyses.</p>	
	<input type="checkbox"/> I CONSENT	<input type="checkbox"/> I DO NOT CONSENT
<p>Place _____, date __/__/____</p> <p style="text-align: right;">Stamp and signature _____</p>		