

## General Data Protection Notice

pursuant to Art. 13 of EU Regulation 679/2016

Euro Company s.p.A. Società Benefit (hereinafter, “Euro Company” or “Data Controller”) invites you to carefully read the General Data Protection Notice before you provide your data. Such notice is provided pursuant to Art. 13 of EU Regulation 679/2016, and the applicable national regulations in force.



### I. Data Controller

*In this section you are provided with our contact details*

- Euro Company: **Data Controller**, with registered office in Godo, Russi (RA), Via Faentina n. 280/286 – Phone +39.0544.416711; Fax +39.0544.414230; website: [www.eurocompany.it](http://www.eurocompany.it); The **Privacy Point of Contact** can be contacted at: [supportoprivacy@eurocompany.it](mailto:supportoprivacy@eurocompany.it)



### II. The Data Protection Officer

*In this section you are provided with our contact details*

- The **Data Protection Officer (DPO)** can be contacted by phone at: +39.0544.416711, or by email at: [dpo@eurocompany.it](mailto:dpo@eurocompany.it)



### III. Types of Personal Data

*This section provides information on what types of data we request from you*

We process the following categories of personal data:

**Personal data directly received from the data subject:**

- **Common:** personal data such as: name, contact details (email).



### IV. Purposes of processing

*In this section we specify why we are requesting your data*

Personal data provided in order to enter into a contract are processed by the Data Controller in compliance with legal and contractual obligations, also with regards to administrative, fiscal and accounting matters.

The provision of data for the above-mentioned purposes is *mandatory*. For this reason, no consent on your part is required, as processing is necessary to:

- Fulfil precontractual and contractual requirements [Art. 6 (1) point (b)];
- Fulfil legal requirements and exercise or defend a right in court [Art. 6 (1) point (c), EU Reg.; Art. 9 (2) point (f), EU Reg.];

and a potential refusal on your part would make it impossible for Euro Company to provide the services requested and to fulfil its obligations.

Furthermore, with your consent, to be manifested by an independent document, Euro Company may ask you for additional data to be used for the following purposes:

- Advertising and marketing by sending newsletters relating to commercial and promotional services offered by the Company.

Failure to provide the data necessary to pursuit of optional purposes will make it impossible to provide any optional services and will not affect the purposes for which the provision of your data is mandatory.

Optional data processing, on the other hand, depends on the manifestation of your free and specific consent, which you may give hereunder on the basis of this Information Notice, which is a stand-alone document.

When necessary for data processing, the Consent shall be provided in writing and may be withdrawn at any time in the same manner in which it was originally granted, by filling out and signing the “Consent Form Withdrawal” drafted by Euro Company for this purpose. The Forms signed by the Data Subjects (or by their authorised representatives) will be stored for 10 years in paper or digital form, starting from the day of their delivery to the person appointed by the Data Controller.



## V. Data Recipients

*In this section, we provide information on who will process your data and to whom such data will be communicated*

---

For the pursuit of the above-mentioned purposes, the personal data provided will be processed by the following entities:

- **Scope attributable to Euro Company:**

by those who, within the Company, require processing in light of their job duties or their job title; such persons shall be duly instructed in order to avoid loss and destruction of, and access to data by unauthorised persons or unauthorised data processing.

Furthermore, data may be used by the following categories of entities performing instrumental activities on behalf of Euro Company S.P.A.:

- **Service companies** providing assistance, advice and processing in accounting, administrative, legal, tax and financial matters; operating computer systems and related data processing procedures; issuing certification of activities carried out, etc;
- **Service companies:** that administer the website on behalf of the Company;
- **Advisors and professionals,** bound by the obligation of professional secrecy, to whom the Company entrusts the management of legal disputes, only for purposes of defence in a Court of Law; law firms and commercial/tax advisors for purposes connected to the management of critical issues deriving from contracts etc.;

The abovementioned parties act as **External Data Processors** on behalf of Euro Company. They have signed a proper Contract or Deed of appointment regulating in detail their processing activities and data protection obligations.

➤ **Scope not attributable to Euro Company:**

your personal data may be transmitted to other independent Data Controllers, in compliance with laws or regulations, or with your explicit consent. The Data Controllers will process your data as indicated in their privacy notices, which we invite you to read.

The personal data provided to Euro Company are neither used nor processed for any purpose other than those indicated. Clients' personal data will not undergo any automated processing activity (including profiling). Should the Company deem it necessary, further specific information on this topic will be provided and you will be asked whether you want to give your consent for this type of processing activities.



## **VI. Data Dissemination**

*In this section, we provide our guarantee that your data will not be disseminated*

---

Your personal data will never be published, disclosed, or made available to/consulted by unspecified parties.



## **VII. Storage of personal data**

*In this section, we provide information on how long we will store your data*

---

Your personal data will be processed for the time required to meet legal obligations and, in any case, in accordance with the relevant statutory and regulatory terms, including those governing the exercise of data subjects' rights.

We also inform you that, in accordance with Art. 5 and 89.1 of EU Regulation, your personal data may be retained for longer periods than discussed in the previous paragraph for statistical purposes only, subject to implementation of the appropriate technical and organisational measures required to safeguard your rights and freedoms.



## VIII. Rights of data subjects

*In this section we provide information on your rights*

---

EU Regulation 679/2016 (Art. 15 to 23) confers the exercise of specific rights on data subjects. In particular, regarding the processing of your personal data, you have the right to obtain from Euro Company:

- **Access:** you can ask for the confirmation as to whether or not personal data concerning you are being processed, as well as further clarification about the information contained in this Notice;
- **Rectification:** you can ask for the rectification or integration of the data you have provided us with, where inaccurate;
- **Erasure:** you can ask for your data to be deleted, where data are no longer necessary for our purposes; in the event of withdrawal of consent or of your objection to processing; in the event of unlawful processing or where a legal obligation to delete applies;
- **Restriction:** you can ask for your data to be processed for storage purposes only, with the exclusion of other processing activities, for a period necessary for your data to be amended, in the event of unlawful processing and for which erasure is objected to; if you need to exercise your rights in a Court of Law and the stored data may be useful for you; and, lastly, in the event of objection to processing, as due diligence is performed to determine whether the Company's legitimate processing grounds override the Data Subject's;
- **Objection:** you can object to the processing of your data at any time, unless we have legitimate grounds for processing which override your interests, e.g. the exercise or defence of our legal claims;
- **Data portability:** you have the right to receive your data - or ask for them to be transmitted to another data controller of your choice - in a structured, commonly used and machine-readable format;
- **Withdrawal of consent:** with respect to optional processing activities, you can withdraw the consent you have previously provided.

You can exercise your rights at any time by contacting via e-mail the **Privacy POC** ([supportoprivacy@eurocompany.it](mailto:supportoprivacy@eurocompany.it)) or the **DPO** ([dpo@eurocompany.it](mailto:dpo@eurocompany.it)).

We also inform you that, should you believe that your rights have been violated, you have the right to lodge a complaint with the Italian Supervisory Authority – i.e., the **Garante per la protezione dei dati personali** (Data Protection Supervisor), at the following address:

Piazza Venezia n. 11 scala b) 00186 ROMA

Telephone: (+39) 06.696771

Fax: (+39) 06.69677.3785

Website: [www.garanteprivacy.it](http://www.garanteprivacy.it)

E-mail: [urp@gpdp.it](mailto:urp@gpdp.it);

Certified E-mail: [protocollo@pec.gpdp.it](mailto:protocollo@pec.gpdp.it).