

## **DISCLOSURE ABOUT THE PROCESSING OF PERSONAL DATA REGARDING CUSTOMER - SUPPLIER INFORMATIONS IN ACCORDANCE WITH ART.13 OF EUROPEAN REGULATION (EU) 2016/679 (GDPR)**

According to the Law, this treatment will be based on principles of fairness, lawfulness, transparency and protection of your privacy and your rights.

Pursuant to Article 13 of EU Regulation no. 2016/679, therefore, we provide you with the following information:

### **1. CONTROLLER OF THE TREATMENT**

Controller of the treatment is Marbella Srl, located in Carpi (MO), Via Degli Scariolanti 16

### **2. PROCESSOR FOR TREATMENT**

Processor of the treatment is Mara Ligabue, mail [maraligabue@marbellasrl.com](mailto:maraligabue@marbellasrl.com)

### **3. CATEGORIES OF PERSONAL DATA SUBJECT OF TREATMENT**

The Data Controller processes personal, identifying and non-sensitive data (specifically name, surname, tax code, VAT number, email address, telephone number - later on just as , "personal data" or even "data") provided or acquired during negotiation, conclusion and / or execution of the commercial relationship established, or at the time of a purchase conclusion.

### **4. SPECIFIC CATEGORIES OF PERSONAL DATA**

The customer is not required to provide data so called "Particulars", that is, according to the provisions of the GDPR (Article 9), personal data revealing racial or ethnic origin, political opinions, religious or philosophical convictions, or union membership, as well as genetic data, biometrics data designed to uniquely identify a natural person, data relating to a person's health or sexual life or sexual orientation.

Should the processing of special categories of personal data become necessary, the holder will inform you promptly and collect his explicit consent.

### **5. TREATMENT METHODS**

The processing of personal data will be in full compliance with the principles of confidentiality, fairness, necessity, relevance, lawfulness and transparency provided by the GDPR.

The processing of personal data will be carried out mainly through the use of electronic tools, in compliance with the current regulatory provisions. Suitable security measures will be observed to prevent the loss of personal data, illicit or incorrect use of the same or unauthorized access.

### **6. PURPOSE OF THE TREATMENT**

Your personal data are processed, without your consent, for the following purposes:

**6.1** registration of personal data and requests for contact and / or information material: the processing of personal data of the interested party takes place to start the preliminary activities and consequent to the registration request, to the management of requests for information and contact and / or sending information material, as well as for the fulfillment of any other obligation arising.

**6.2** the management of the contractual relationship: the processing of personal data of the interested party takes place to start the preliminary activities and consequent to the purchase of a service, the management of the related order and the provision of the service itself, the related invoicing and management of payment, the processing of reports to the assistance service and the provision of the assistance itself, the prevention of fraud and the fulfillment of any other obligation arising from the contract or agreements made.

**6.3** promotional activities on Services similar to those purchased by the interested party (Recital 47 GDPR): the data controller, even without explicit consent, may use the contact details provided by the interested party, for the direct sale of their services, limited to the case in which the services are similar to those sold, unless the interested party explicitly objects.

**6.4** legal and administrative obligations: personal information may be used and disclosed in a necessary or appropriate manner, especially if subject to legal or legitimate interest:

Fraud Prevention: We may use and disclose personal information collected from and on our users in the manner necessary to investigate, prevent or respond to suspected illegal or fraudulent activities or to protect our security, privacy, rights or property of our users or third parties.

Purpose of law enforcement: if required or imposed by governmental authorities, such as public security authorities, courts, regulatory authorities, or otherwise to comply with the law, (including rules outside the country of residence of the interested party) we may be required to disclose the information we have about our users. The information collected about the data subject may be used and disseminated to enforce or protect the legal rights or defend against legal actions.

The provision of data for the aforementioned purposes is instrumental and necessary for the execution of orders and contracts and the administrative, commercial, fiscal and accounting management of the relationship established or established, and therefore the 'failure to provide such data could lead to the objective impossibility to establish, continue or execute the report.

## **7. LEGAL BASIS OF TREATMENT**

The treatment carried out is based, for each of the purposes of treatment, on:

- performance of the services related to the request for registration, information and contact and / or sending of informative material and compliance with legal obligations (6.1)
- performance of the services related to the contractual relationship and compliance with legal obligations (6.2) - legitimate interest of the data controller (6.3)
- compliance with legal obligations (6.4).

## **8. COMMUNICATION AND DIFFUSION OF DATA**

Data provided may be disclosed to external parties duly appointed who carry out activities on behalf of the data controller such as by way of example: accountant, institutions credit and other related external professionals. The data can be communicated to the duly appointed staff. It is not foreseen the communication to third countries extra U.E and the diffusion is not foreseen (eg social networks, internet sites etc ..).

## **9. PERIOD AND CONSERVATION CRITERIA OF THE DATA**

We inform you that your personal data will be stored for a period of 10 years from the termination of the contractual relationship in place for the purposes described there.

## **10. RIGHTS OF THE INTERESTED**

At any time, you can exercise, pursuant to art. 15 and ss. of the GDPR 2016/679, the right to: a. access; b. correction and cancellation; c. treatment limitation, d. data portability, e. opposition to treatment, f. opposition to an automated decision-making process, including profiling.

Articles 15 to 23 of the Rules can be consulted at this link: [https://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679 & from = IT](https://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679&from=IT)

For the exercise of your rights you can contact Marbella Srl, mail [maria.ligabue@marbellasrl.com](mailto:maria.ligabue@marbellasrl.com)