

DISCLOSURE FOR CLIENTS AND SUPPLIERS

ON THE PROTECTION OF PERSONAL DATA PURSUANT TO ARTICLES 12 et seq. OF EU REGULATION 679/2016 AND OF THE LEG. DECREE 196/2003 AS AMENDED BY LEG. DECREE 101/2018

Our Company has always been very attentive to the aspects of protection of personal data and regarding the principles of confidentiality and dignity of people.

Pursuant to the new EU Regulation 679/2016 and in accordance with the principle of accountability, any processing of personal data must be lawful and fair. The method for the collection, use, consultation or otherwise processing and to what extent the personal data is or will be processed should be clear to natural persons.

The principle of transparency requires that any information and communication relating to the processing of those personal data be easily accessible and easy to understand, and that clear and plain language be used.

This principle applies, in particular, to the information provided to data subjects on the identity of the Data Controller and on the processing methods and further information (see articles 13 and 14 of EU Regulation 679/2016) to ensure fair and transparent processing regarding natural persons concerned and their right to obtain confirmation and communication of personal data concerning them which are being processed (see Recital 39, EU Regulation 679/2016).

In light thereof, please read the following disclosure.

Antonio Lupi Design S.p.a., with registered office at 73/75, Via Mazzini, 50050 Stabbia Cerreto Guidi (FI), tax code and VAT no. 04980750485, in its capacity as Data Controller, in the person of its legal representative pro-tempore, pursuant to EU Regulation 2016/679, hereby informs the data subject that the personal data which concern him/her, which have been collected by the Data Controller or which will be requested in the future and/or communicated by third parties, are necessary and will be used for the following purposes.

PURPOSES AND LAWFULNESS OF PROCESSING

Pursuant to EU Regulation 679/2016, personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject (article 5);
- The same are collected for specified, explicit and legitimate purposes and subsequently processed in a manner that is incompatible with those purposes (article 5);

The data shall be collected for the following purposes:

- For the pursuit of material and/or complementary to activities that are essential for the performance of the existing contractual/pre-contractual relationship;
- For general accounting purposes, invoicing, management of debts, civil and tax obligations stipulated by law and for the update of archives;
- To establish the degree of satisfaction of data subject with regards to the quality of the products and services provided by the company, including statistical analysis;
- Data is processed for the sending of service communication, for the management of requests for clarification, for the notification and management of complaints relating to the concluded contractual relationship, and for the performance thereof.

LEGAL BASIS OF THE PROCESSING

Processing is lawful under the following conditions:

- Pursuant to art. 6, paragraph 1, lett. b) EU Regulation 679/2016, the processing is necessary for the execution of a contract of which the interested party is a party or for the execution of pre-contractual measures adopted at the request of the same;
- Pursuant to art. 6, paragraph 1, lett. c) EU Regulation 679/2016, the processing is necessary to fulfill a legal obligation to which the data controller is subject;

- Pursuant to art. 6, paragraph 1, lett. f) EU Regulation 679/2016, the processing is necessary for the pursuit of the legitimate interest of the data controller or third parties, provided that the interests or fundamental rights and freedoms of the data subject that require the protection of personal data do not prevail, in particular if the person concerned is a minor. The legitimate interest of the Data Controller is connected to the management of personal data for promotional and marketing purposes.

METHODS OF PROCESSING AND OBLIGATION OF CONFIDENTIALITY

The processing of data shall be performed with the use of IT tools and/or on paper, by persons who have a duty of confidentiality, with logic linked to the purposes of such processing and, in any case, in such a way so as to guarantee the safety and confidentiality of the data. The data collected will not be disclosed and disseminated to third persons, pursuant to the law.

You may be contacted by email for promotional purposes related to our products or services.

DISCLOSURE TO THIRD PARTIES

Your personal data may be disclosed to third parties known to us solely and exclusively for the aforementioned purposes and to the following categories of persons:

- External companies who provide services on our behalf;
- Public bodies and administrations for the fulfilment of legal obligations;
- Professionals who may be of assistance in the fulfilment of legal obligations.

Said persons will process the personal data in the capacity of external Data Processor.

Your data may be transferred both within the EU area and outside the EU area. In this second case, the transfer will take place, where present, in compliance with the adequacy decisions pursuant to art. 45 EU Regulation 679/2016 or, in any case, based on art. 49, paragraph 1, lett. b of the European legislation.

TERM OF RETENTION

Pursuant to article 5 of EU Regulation 679/2016, "*Principles relating to processing of personal data*", personal data shall be kept in a form which permits identification of data subjects for no longer than what is necessary for the purposes for which the personal data is processed.

The personal data of the data subjects may also be stored for longer periods insofar as the personal data will be processed solely for the purpose of fulfilling obligations stipulated by current laws (for example, for accounting purposes) and, in any case, by applying all technical/organisational measures that will activate mechanisms of anonymisation of the data.

RIGHTS OF THE DATA SUBJECT

Pursuant to current legislation, the data subject may exercise his/her rights with the Data Controller, as such rights are stipulated by art. 15 and ss. of EU Regulation 679/2016.

In addition to these rights, the interested party has the right to lodge a complaint with the Supervisory Authority in the event of a law.

For more information in relation to how to exercise these rights, please read the "Procedure of the rights of the interested party" at the link www.antoniolupi.it.

DATA CONTROLLER, DATA PROTECTION OFFICER AND PRIVACY COMMUNICATION

The Data Controller is Antonio Lupi Design S.p.a.

For all communication pursuant to the aforementioned articles of EU Regulation 679/2016, please contact the Data Controller at the address: 73/75, Via Mazzini, 50050 Stabbia Cerreto Guidi (FI); Telephone 0571 586881; Fax: 0571 586885; Email: privacy@antoniolupi.it.

Cerreto Guidi, 30/07/2020

Signature of the Data Controller


ANTONIO LUPI DESIGN S.p.A.