

**DISCLOSURE FOR CLIENTS AND POTENTIAL SUPPLIERS****ON THE PROTECTION OF PERSONAL DATA PURSUANT TO ARTICLES 12 et seq. OF  
EU REGULATION 679/2016**

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. It should be clear to natural persons that personal data concerning them are collected, used, consulted or otherwise processed and to what extent the personal data are or will be processed. 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 in respect of the 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, we would appreciate it if you would 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 interim legal representative, 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);- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (article 5);The data shall be collected for the following purposes:

- Acquisition of information prior to the conclusion of a contract;
- Performance of a service or of one or more operations under negotiation or which the data subject has requested;
- Commercial promotional activities of the Data Controller's services

## LEGAL BASIS OF THE PROCESSING

Processing is lawful under the following conditions:

- Pursuant to art. 6, paragraph 1, lett. d) EU Regulation 679/2016, the processing is necessary for the protection of the vital interests of the data subject or of another natural person;
- 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 safety and protection of company assets.

## METHODS OF PROCESSING AND OBLIGATION OF CONFIDENTIALITY

The processing of data shall be done 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.

## DISCLOSURE TO THIRD PARTIES

Your personal data may be disclosed to third parties known to us solely and exclusively for the aforementioned and, in particular, 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.

These subjects will process personal data as Data Controller or independent data controllers.

## 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 is necessary for the purposes for which the personal data are 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/organizational measures that will activate mechanisms of anonymization 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 Regulation EU 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](http://www.antoniolupi.it).

## DATA CONTROLLER, DATA PROTECTION OFFICER AND PRIVACY COMMUNICATION

# antoniolupi

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**75**

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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](mailto:privacy@antoniolupi.it).

Cerreto Guidi, 30/07/2020

**Signature of the Data Controller**



ANTONIO LUPI DESIGN S.p.A.