

**INFORMATION ON THE PROCESSING OF CLIENTS' PERSONAL DATA BY SICIM S.P.A.**

(art. 13 Reg. EU 679/2016)

**Short privacy policy**



<b>Who processes my personal data?</b>
The Data Controller is <b>SICIM S.p.A.</b>
Registered office: via ConsolatICO Superiore 96/98, Busseto (PR)
E-mail address: <a href="mailto:privacy@sicim.eu">privacy@sicim.eu</a>

<b>For which purposes does SICIM process my data?</b>	<b>Why is the processing of my data lawful?</b>	<b>To whom will my data be disclosed?</b>	<b>How long will my data be stored?</b>
For administrative purposes and to manage the contractual relationship established with you.	Because it is necessary for the performance of a contract to which you are a party or for the performance of pre-contractual measures taken at your request, as well as for the fulfilment of legal obligations to which the Data Controller is bound.	<ul style="list-style-type: none"> <li>• Professionals and/or Professional practices</li> <li>• Insurance companies</li> <li>• Banks and credit institutions</li> <li>• Suppliers of IT services and management software</li> <li>• Other SICIM branches</li> </ul>	For 10 years from the end of the contractual relationship.
<b>What happens if I do not provide my data?</b>	It will be impossible to properly establish or continue the contractual relationship.		

<b>What are my rights?</b>	With regard to the personal data you have provided, you have the right to obtain their: •access •correction •portability, and in certain cases: •deletion •restriction of processing. You may exercise your rights by writing to the Controller's e-mail address: <a href="mailto:privacy@sicim.eu">privacy@sicim.eu</a>
<b>Who can I lodge a complaint with?</b>	If you consider that your rights have been violated, you have the right to lodge a complaint with the Italian Data Protection Authority via the procedure indicated on the website <a href="http://www.garanteprivacy.it">www.garanteprivacy.it</a>



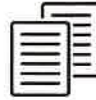
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## Extended privacy policy



### 1. WHO PROCESSES MY PERSONAL DATA?

The Data Controller of your personal data is SICIM S.p.A. with registered office in Busseto (PR) via ConsolatICO Superiore 96/98. You may contact the Data Controller:

- by phone at 0524 930211
- via e-mail at [privacy@sicim.eu](mailto:privacy@sicim.eu)

### 2. WHAT ARE THE PURPOSES FOR THE PROCESSING OF MY DATA AND WHY IS IT LAWFUL?

Your data is processed for the management and fulfilment of obligations arising from and related to the contract established, for example:

- For administrative purposes and for the management of your position, for the dispatch of purchase orders, including the forwarding of communications by e-mail to the address you have provided, the performance of transportation and assistance services.

The processing of your data for the purpose of managing the contractual relationship is lawful because it is necessary for the performance of a contract to which you are a party or the execution of pre-contractual measures taken at your request, as well as for the fulfilment of fiscal, accounting and civil law obligations to which the Controller is bound.

PURPOSES	LEGAL BASIS	OBLIGATION TO PROVIDE DATA
<b>Administrative and for the management of the contractual relationship.</b>	The processing of your data is legitimate because it is necessary for the performance of the contract established between you and the Controller, as well as for the fulfilment of the legal obligations to which the Controller is bound.	For this purpose, you are required to provide your data due to a contractual obligation.

### 3. TO WHOM WILL MY DATA BE DISCLOSED?

Your data may be communicated to:

- Professionals and/or professional practices that provide the Data Controller with assistance/advice in the fields of accounting, administration, law, taxation;
- Insurance companies;
- Banks and Credit Institutions;
- Suppliers of management software and IT services;
- Other SICIM branches.

You can request a complete list of the recipients of your personal data by writing to [privacy@sicim.eu](mailto:privacy@sicim.eu).

In any case, your personal data will not be disseminated.



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#### 4. IS MY DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION?

In general, the Data Controller does not transfer your personal data to countries outside the European Economic Area.

Any data transfers that may be necessary, for example to perform the contract entered into with you, or because they are based on an adequacy decision of the European Commission or the Standard Contractual Clauses, or to establish, exercise or defend a right in court, will in any case take place in compliance with Regulation 679/2016.

#### 5. HOW LONG WILL MY DATA BE STORED?

The Data Controller will keep your personal data for a period of time not exceeding that necessary to achieve the purposes for which it is processing them. Specifically:

- for the purpose of managing the contractual relationship, your data will be retained for 10 years from the end of the contractual relationship on the basis of the civil law requirement to retain relevant documents for accounting, tax and anti-money laundering purposes in accordance with the relevant regulations, unless it is necessary to retain them further for legal protection purposes.

At the end of this period, the Data Controller will either erase the data irreversibly - by means of destruction or secure erasure methods - or store them in an anonymous form that does not allow, even indirectly, your identification.

#### 6. WILL I BE SUBJECT TO PROFILING?

Under no circumstances will your data be used to obtain information about your preferences or behaviour, nor will you be subject to any decision based solely on automated processing of your personal data.

#### 7. WHAT ARE MY RIGHTS?

You have the following rights:

- **Right of access:** the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you are being processed and, if so, to obtain access to your personal data - and a copy thereof - and to receive information about the processing;
- **Right to rectification:** the right to obtain from the Data Controller the rectification of inaccurate personal data concerning you without undue delay and the integration of incomplete personal data, including by providing a supplementary declaration.
- **Right to erasure:** the right to obtain from the data controller the erasure of personal data concerning you without undue delay if one of the following grounds applies:
  - personal data are no longer necessary in relation to the purposes for which they were collected or processed;
  - the data subject objects to the processing and there is no overriding legitimate reason to process the data;
  - personal data have been unlawfully processed;
  - personal data must be erased in order to comply with a legal obligation to which the Controller is subject;
  - personal data have been collected in connection with the provision of information society services.
- **Right to the restriction of processing:** the right to obtain from the Controller the restriction of processing when one of the following cases occurs:
  - you challenge the accuracy of the personal data, for the period necessary for the Controller to verify the



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accuracy of the data;

- the processing is unlawful and you object to the deletion of your personal data and request that their use be restricted instead;
- although the Controller no longer needs the data for processing purposes, the personal data are required by you for the establishment, exercise or defence of a legal claim;
- you have objected to the processing pending verification of whether the legitimate reasons of the data controller prevail over your own.

- **Right to data portability:** the right to receive in a structured, commonly used and machine-readable format the personal data concerning you that you have provided to the Controller and to transmit such data to another controller where the processing is based on consent or on a contract and is carried out by automated means.
- The right not to be subject to a **decision based solely on automated processing**, including profiling, which produces legal effects concerning you or significantly affects you in a similar way.

You may exercise your rights by sending a request to the Controller's e-mail address [privacy@sicim.eu](mailto:privacy@sicim.eu). The Data Controller shall reply as soon as possible and, in any event, no later than 30 days after your request.

## 8. HOW CAN I LODGE A COMPLAINT?

If you wish to lodge a complaint about the way in which your personal data are processed by the Controller or about the handling of a complaint you have submitted, you have the right to lodge a complaint directly with the Supervisory Authority in accordance with the procedures indicated on the website [www.garanteprivacy.it](http://www.garanteprivacy.it).

Busseto, 14/09/2021

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C. F. e P. IVA 00143470342



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