

## **Porpora Group**

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Porpora Group Srl - Share capital € 90,000.00 fully paid-up  
Milan Chamber of Commerce, Tax Code,  
VAT Number and registration number with the Chamber of Commerce 03374260150

# **INFORMATION ON THE PROCESSING OF PERSONAL DATA**

Porpora Group Srl (hereinafter "Data Controller"), as the data controller, informs you, pursuant to Art. 13 of Legislative Decree 30.06.2003 No. 196 (hereinafter, "Privacy Code") and Art. 13 EU Regulation No. 2016/679 (hereinafter, "GDPR"), that your data will be processed in the following ways and for the purposes outlined below:

## **1. PURPOSE OF PROCESSING:**

The Data Controller processes your personal data (e.g. name, surname, company name, address, telephone number, email, banking and payment references - hereinafter "personal data" or "data") that you provided on the occasion of the conclusion of contracts for services provided by the Data Controller, also in a pre-contractual phase.

## **2. PURPOSE OF PROCESSING:**

Your personal data is processed:

1. a. Also without your express consent (Art. 6 Lett. b), e), f) GDPR) for the following purposes:
  - a. i. Conclude contracts for services provided by the Data Controller in the course of business activity;
  - b. ii. Fulfill pre-contractual, contractual, and tax obligations deriving from relationships with you;
  - c. iii. Fulfill obligations provided for by law, regulations, EU legislation or orders from Authorities (e.g. concerning anti-money laundering);
  - d. iv. Exercise the rights of the Data Controller, for example in defense of its own judgment.
2. b. Only with your express consent, for the following direct marketing purposes:
  - a. i. Sending informative communications regarding regulatory compliance, initiatives and events of the Data Controller, promotions and offers of services, also through newsletters, conducting customer satisfaction surveys (also electronically with the aid of automated tools), profiling activities aimed at targeted communications.

### **3. METHODS OF PROCESSING:**

The processing of your personal data is carried out by means of the operations listed in Art. 4, No. 2 GDPR, and specifically: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion, and distribution of data. Your personal data is subject to both paper and electronic and/or automated processing. The Data Controller will process personal data for the time necessary to fulfill the aforementioned purposes and in any case for no longer than 10 years from the termination of the relationship established in relation to the Service purpose (2.a) and for no more than 4 years from the collection of data for marketing purposes (2.b).

### **4. DATA ACCESS:**

Your data may be made accessible for the purposes of 2.a) and 2.b) of this information:

- i. To employees and collaborators of the Data Controller, in their capacity as internal controllers and/or managers and system administrators;
- ii. To third-party companies or other subjects (such as, for example, banks, factoring companies, professional firms, consultants, insurance companies for the provision of insurance services, etc., who carry out outsourcing activities or provide services of various kinds on behalf of the Data Controller, in their capacity as external data processors.

### **5. DATA DISCLOSURE:**

Without the need for express consent (Art. 6, Lett. b), c), and f) GDPR), the Data Controller may disclose your data for the purposes of Art. 2.a) to supervisory bodies, judicial authorities, insurance companies for the provision of insurance services, as well as to those subjects to whom communication is mandatory by law for the fulfillment of said purposes. Also for the purposes of Art. 2.a), your data may be disclosed to third-party companies, such as logistics service providers appointed by the Data Controller. These subjects will process the data as autonomous data controllers. Your data will not be disseminated.

### **6. DATA TRANSFER:**

Personal data is stored on servers located in Italy, within the European Union. It is understood, however, that the Data Controller, if necessary, may have the right to move servers also outside the EU. In this case, the Data Controller ensures in advance that the transfer of data outside the EU will take place in compliance with the applicable legal provisions, after the conclusion of the standard contractual clauses provided by the European Commission.

### **7. NATURE OF DATA PROVISION AND CONSEQUENCES OF REFUSAL TO RESPOND:**

The provision of data for the purposes of point 2.a) is mandatory. Without it, the Data Controller will not be able to guarantee the contractual performance referred to in point 2.a). The provision of data for the purposes of Art. 2.b) is instead optional. You can therefore decide to deny the

possibility of processing already provided data: in this case, you will no longer receive informational, commercial, and promotional communications regarding the services offered by the Data Controller. You will, however, continue to have the right to the Services referred to in Art. 2.a).

## **8. RIGHTS OF THE DATA SUBJECT:**

As the data subject, you have the rights under Art. 15 GDPR, specifically the rights to:

- a. Obtain confirmation of the existence or otherwise of personal data concerning you, even if not yet recorded, and their communication in an intelligible form;
- b. Obtain indication:
  - a) Of the origin of the personal data;
  - b) Of the purposes and methods of processing;
  - c) Of the logic applied in the case of processing carried out with the aid of electronic tools;
  - d) Of the identifying details of the Data Controller and the processors referred to in Art. 3, paragraph 1 GDPR;
  - e) Of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it as designated representative in the territory of the State, managers or authorized persons.
- c. Obtain:
  - a) The updating, rectification, or, when interested, integration of data;
  - b) The erasure, transformation into anonymous form, or blocking of data processed in violation of the law, including data that does not require storage in relation to the purposes for which the data was collected or subsequently processed;
  - c) Certification that the operations referred to in letters a) and b) have been brought to the attention, also regarding their content, of those to whom the data has been communicated or disseminated, except in cases where this fulfillment proves impossible or involves a use of means manifestly disproportionate to the protected right;
- d. Object, in whole or in part:
  - a) For legitimate reasons to the processing of personal data concerning you, even if pertinent to the purpose of the collection;
  - b) To the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for the performance of market research or commercial communication, using automated call systems without the intervention of an operator, by email and/or using traditional marketing methods, by telephone and/or by postal mail. It is noted that the data subject's right to object, as explained in the previous point b), to direct marketing purposes via automated methods also extends to traditional methods, and that in any case the data subject has the right to exercise the right to object only in part. Therefore, the data subject can decide to receive only communications through traditional

methods or only automated communications, or neither of the two types of communication.

- e. Where applicable, also have the rights under Articles 16-21 GDPR (Right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object), as well as the right to lodge a complaint with the supervisory authority.

It is specified that the data subject has the right to object at any time, for reasons related to their particular situation, to the processing of personal data concerning them pursuant to Article 6, paragraph 1, letters e) or f) of the GDPR, including profiling based on these provisions.

If personal data is processed for direct marketing purposes, the data subject has the right to object at any time to the processing of personal data concerning them for such purposes, including profiling to the extent that it is related to such direct marketing.

## **9. EXERCISE OF RIGHTS:**

You can exercise the rights indicated in paragraph 8 at any time by sending:

- a. A registered letter with return receipt requested to Porpora Group Srl, Via Ambrosoli 3 – 20090 Rodano (MI)
- b. An email to the address [segreteria@porpora-group.it](mailto:segreteria@porpora-group.it);
- c. You can also revoke consent and exercise your rights by directly sending the appropriate form downloadable from the website [www.garanteprivacy.it](http://www.garanteprivacy.it)

## **10. DATA CONTROLLER, DATA PROCESSOR AND APPOINTED DATA PROCESSORS:**

The data controller is Porpora Group Srl, with registered office in Via Ambrosoli 3 – 20090

Rodano (MI), tax code and VAT number 03374260150.

The Data Processor is Dr. Valeria Alma Vezzani, tel. 0221871340, email: [segreteria@porpora-group.it](mailto:segreteria@porpora-group.it).

The updated list of data processors and persons in charge of processing is kept at the registered office of the Data Controller.