



SIDER ENGINEERING S.p.A.

PROGETTAZIONE, COSTRUZIONE E COMMERCIALIZZAZIONE DI IMPIANTI INDUSTRIALI
DESIGN, MANUFACTURING AND SALES OF INDUSTRIAL PLANTS

TEL./PHONE: .++39 0432 525911
FAX: ++39 0432 525921

PRIVACY DATA POLICY

Dear Supplier/Customer,

Sider Engineering S.p.a. with Registered Office in Via Buttrio – 33050 – Pozzuolo del Friuli (UD) – VAT nr. 02336220302 (hereinafter “Data Controller”), as Controller of Data Processing, informs you that as required by the EU Regulation n. 2016/679, your personal data will be processed basing on the principles of correctness, lawfulness and transparency. The protection of your privacy and rights will be managed with following methods and for the following purposes:

1. Object of the Privacy data policy

The Data Controller processes all personal data such as, name, surname, company name, address, phone number, E-mail, bank data and payment references (hereinafter “Personal Data”) – collected by contract conclusion.

2. Aim of the Privacy data policy

We provide you the following information about the aims of your personal data processing, without your express consent art. 6 lett. b), e) GDPR), for the following purposes:

- to conclude a contract;
- to fulfill the pre-contractual, contractual and tax obligations deriving from a pre-existing relations with your company;
- to fulfill the obligations established by law, by a regulation, by the Community legislation or by an order of the Authority (such as for anti-money laundering);
- to exercise the Data Controller rights, for example the right of defense in court;

3. Processing methods

The processing of your personal data is carried out by means of the operations indicated in art. 4 n. 2) GDPR and more precisely: collection, recording, organization, structuring, preservation, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of provision, comparison or interconnection, limitation, cancellation and data destruction.

Your personal data are subjected to both paper and electronic and / or automated processing.

The Data Controller will process the personal data for the time necessary to fulfill the abovementioned purposes and will keep the data up to the prescription period.

4. Data access

Your data may be made accessible for the purposed indicated in the art. 2:

- to employees and collaborators of the Data Controller or to the company Sider Engineering S.p.A. in their capacity as persons in charge and/or internal managers of the processing system and/or system administrators;
- to third-party companies or other subjects (i.e. credit institutions, professional practices, consultants, etc.) who carry out outsourcing activities on behalf of the Data Controller, in their capacity as external data processors.

5. Data transmission

Without the need of an express consent art. 6 lett. b) and c) GDPR), the Data Controller may communicate your data for the purposes referred in art. 2 to supervisory bodies, legal authorities, as well as to those subjects to whom the communication is mandatory by law for the accomplishment of the said purposes. These subjects will process the data in their capacity as independent data controllers.

Your information will not be disseminated.

6. Data transfer and consequences for answer refusal

The provision of data for the purposes indicated in art. 2 is mandatory, but your consent is not required.



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7. Data subject rights

In compliance to art. 15 GDPR every data subject has the following rights:

- to obtain the confirmation of the existence (or not) of personal data relating to him/her, even they have not been stored yet, as well to obtain their communication in an intelligible way;
- to obtain information on:
 - i. origin of the personal data;
 - ii. purposes and processing methods;
 - iii. logic applied in case of treatment carried out with electronic instrument;
 - iv. identification details of the Data Controller, managers and designated representative according to art. 3, paragraph 1, GDPR;
 - v. subjects or subject categories to whom the personal data may be transferred or designated representative in the State territory, managers or appointed persons that may be aware of the personal data.
- to obtain:
 - i. the update, the correction, i.e. the integration of the personal data, in case of interest;
 - ii. the cancellation, transformation in an anonymized form or to ask the block of the processed data in violation of law, including those data whose storage is not necessary for the purposes for which the data has been collected or subsequently processed;
 - iii. the attestation that the operations referred in letters a) and b) have been brought to the attention, also with regard to their content, to whom the data have been communicated or disseminated, except in the case in which this fulfillment turns out to be impossible or involves a use of means manifestly disproportionate to the protected right.
- to object completely or partially,
 - i. to the processing of personal data relating to you for legitimate reasons, even if pertinent to the collection purpose;
 - ii. to data processing for advertising purposes or direct sales or for carrying out market research or commercial communication, through the use of automated call systems without an operator intervention, by mail and/or by post. It is noted that the right to object of the interested party, as already explained in the previous paragraph (B), for advertising purposes through automated methods, extends to the most common methods. In any case persists the possibility for the interested party the right to object even partially. Therefore, the interested party can decide to receive only communications by traditional methods, that is just through automated communications or none of the two communications types.

Where applicable the data subject can assert the rights under art. 16-21 GDPR (Right to rectifications, Right to erasure, Right of restriction of processing, Right to data portability, Right to object) included the right to complaint to the Guarantor Authority.

8. How to exercise the rights

At any moment the data subject can exercise his/her right by sending:

- a registered letter to Sider Engineering SpA, via Buttrio- 33050- Pozzuolo del Friuli-(UD)
- an e-mail to privacy@siderengineering.it

9. Data controller, Processing manager and designated representative

The Data controller is Sider Engineering S.p.A. with registered office in Via Buttrio - 33050 – Pozzuolo del Friuli (UD)

The Processing Manager is Mr. Sarasso Lanfranco.

The updated list of the processing managers and other designated representatives is stored by the registered office of the Data Controller.