

INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA OF CUSTOMERS / PROSPECTS IN ACCORDANCE WITH ART. 13 AND 14 OF REGULATION (EU) 2016/679 ("GDPR")



Data Controller

SIAD Società Italiana Acetilene & Derivati S.p.A.
Via S. Bernardino, 92 - 24126 Bergamo - IT
siad_privacy@siad.eu - P. IVA 00209070168
("Company" or "Data Controller")



Data Protection Officer (DPO)

The Data Protection Officer can be contacted at the following e-mail address: siad_dpo@siad.eu



PERSONAL DATA PROCESSED

The personal data processed concerns the following categories of common customer/prospect data:

- personal data (first name, surname, tax code);
- contact details (company e-mail address, personal e-mail address, company phone number);
- organizational data (company, corporate role).

The personal data as reported above may come from various third-party sources, with uploading processes that vary depending on the source. In particular, personal data is acquired from:

- companies specializing in providing B2B or B2C contacts (e.g. Cerved Group S.p.A.);
- commercial partners of SIAD (e.g., OEM machinery manufacturers);
- publicly available sources: public registers, company websites or professional social media profiles (e.g., LinkedIn).

The Data Controller does not process special categories of personal data or data relating to criminal convictions and offenses as described in Art. 9 and 10 of the GDPR.



PURPOSES OF THE PROCESSING

Customer and prospect data management (through the *Customer Relationship Management* tool)

Prospect management, i.e. purposes related to the establishment and performance of the contractual relationship/provision of services/sale of goods

Sales management, i.e. purposes related to the establishment and performance of the contractual relationship/provision of services/sale of goods

Send information and promotional materials via newsletters (marketing) or other automated means of contact (e.g. e-mail) about the products/services offered/ requested by the Company, market surveys and statistical analyses

Compliance with obligations provided for by regulations and applicable national and supranational legislation

If necessary, to ascertain, exercise or defend the Data Controller's rights in and/or out of court



LEGAL BASIS FOR THE PROCESSING

Legitimate interest of the Data Controller

Performance of a contract or steps to enter into a contract

Legitimate interest of the Data Controller (art. 130, IV of Legislative Decree 196/2003, as amended by Legislative Decree 101/2018)

Necessity to comply with legal obligations

Legitimate interest of the Data Controller



DATA RETENTION PERIOD

For the time necessary to manage the *application management* and no longer than two years

- Contact details, until opt-out by the data subject.
- Data relating to marketing activities: 2 years from the collection of each piece of data

Contractual term and, after termination, 10 years

In the event of litigation, for the entire duration of the litigation, until the time limit for appeals have been expired

Once the above retention periods have expired, the data will be destroyed or made anonymous, depending on the technical backup and deletion procedures and the accountability requirements of the Data Controller.



DATA PROVISION

The provision of Data is mandatory for the conclusion of the contract and/or for its execution.



DATA RECIPIENTS

Data may be communicated to external parties acting as independent Data Controllers, for example, authorities and supervisory/control bodies and, in general, any public or private parties entitled to request it.

Data may be processed, on behalf of the Data Controller, by external parties designated as Data Processors that perform specific operations on behalf of the Data Controller. These subjects include but are not limited to:

- companies offering email sending services;
- companies offering CRM system maintenance services;
- companies offering support in conducting market research.



AUTHORIZED PROCESSING SUBJECTS

The data may be processed by employees of the company departments responsible for the pursuit of the above-mentioned purposes, who have been expressly authorized to process data and have received suitable operating instructions.



TRANSFER OF PERSONAL DATA TO COUNTRIES NOT BELONGING TO THE EUROPEAN UNION

The Company does not transfer personal data outside the European Union.



DATA SUBJECT RIGHTS - COMPLAINTS TO THE SUPERVISORY AUTHORITY

By contacting the Company via e-mail at siad_privacy@siad.eu, the data subject may request from the Company access to data concerning him/her, their deletion, rectification of inaccurate data, integration of incomplete data, deletion of data, limitation of processing in the cases provided for by art. 18 GDPR, as well as object to processing carried out for legitimate interest of the data controller.

The data subject, furthermore, in the event that the processing is based on consent or contract and is carried out with automated means, has the right to receive the data in a structured, commonly used and machine-readable format, as well as, if technically feasible, to transmit them to another controller without impediments.

Data Subjects shall have the right to lodge a complaint with the competent Supervisory Authority in the Member State in which they normally reside or work, or in the State in where the alleged infringement has occurred.