

PRIVACY POLICY AND DATA PROTECTION

Pursuant to Section 13 of Legislative Decree no. 196/2003 Personal Data, we inform that the treatment of Personal Data will respect the principles of fairness, legality, transparency and protection of your privacy and rights.

This Policy contains the information required by art. 13 of Regulation (EU) 679/2016 concerning the protection of natural persons with regard to the processing of Personal Data (hereinafter “GDPR”) which became applicable from May 25, 2018 in all the Member States of the European Union and belonging to the European Economic Area.

Data Controller:

The Data Controller of Personal Data is
PALAZZO MORELLI SRL A SOCIO UNICO

With registered office in Italy, Pantalla di Todi (PG) via Tiberina Sud 191. PALAZZO MORELLI, is responsible for the legitimate and correct processing of Personal Data.

The updated list of the Data Supervisors and Data Processors, nominated by PALAZZO MORELLI will be made available upon request to be sent by email to the following address:
palazzomorelli@legalmail.it

1. Purposes and legal basis of Personal Data Processing

The personal data provided will be processed by Palazzo Morelli for advertising activities, pre-contractual purposes, contractual obligations, management of customers and suppliers.

Your Personal Data are processed:

A) also without your express consent in full fairness pursuant to art. 6 b), e) of GDPR for the following purposes:

1. Pre-contractual information needed for the drafting of the contract;
2. Submission of offers/agreements;
3. Fulfilment of obligations and execution of the activities included in the business agreements;
4. Fulfilment of the Law obligations on the subjects of administration, tax, accountability, safety and health at work, sustainability;
5. Fulfilment of the Law obligations, of a Regulations, of European Legislation, order of the Authority;
6. Exercise any of the Rights of the Data Controller, as for example, the right to present a defence;

B) with your prior express consent for the following purposes:

7. to sent, also by email, newsletters of an informative and / or advertising nature, commercial communications and invitations;

2. Data recipients and Transfer of Personal Data

Your Personal Data may be communicated exclusively for the purposes listed under the above art. 1):

1. to all subjects that are allowed to have access to Personal Data in accordance with the Laws, Regulations and any other European Legislation;

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06059, Pantalla di Todi (PG)
Italia

Tel.
075 894 4888

E-mail
info@palazzomorelli.it

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2. to Data Processors, under the direct authority of the Controller, following the instructions given by the Data Controller;
3. to professionals and / or companies that supplies to the Data Controller professional services on the subjects of administration, finance or legal services which are needed for the execution of the business;
4. banks and financial institutions for the fulfillment of the payments;

Your Data may be included and publicized, limited to the company name, in the list of the clients of Palazzo Morelli.

Data are processed by the Data Controller, Data Supervisors and Data Processors nominated by the same Data Controller. All the appointed subjects will process the Data exclusively on behalf of the Data Controller within the limits and in compliance with the indications contained in the Deed of Appointment.

Personal Data will not be publicized and won't be transferred to third countries or international organizations.

3. Data processing arrangements and time-limits for storing the Data

Data supply, as described in the above point 1. A) is strictly necessary for the execution of the activities and it is mandatory for the person concerned. The lack of Data conferment will make impossible the execution of the business agreement/ request.

Your Personal Data are processed using both paper and electronic means.

The Data will be stored for the period of time necessary to execute the business agreement and after that for a period of time necessary to fulfill Law obligations in subject of administration and finance. The Data Controller informs that **the data will be stored for a period that fits the processing purposes**. In any case the period of Data storage will not exceed 10 +1 years after the end of the purposes.

4. Data Subjects' Rights

We remind the Data Subjects' Rights as per art.15 of the above mentioned GDPR and precisely the rights to obtain from the Data Controller – without “justifiable excuse” – the confirmation as whether or not personal data concerning him or her are being processed and the following information (art. 15 GDPR):

1.
 - a) processing purposes;
 - b) categories of Personal Data;
 - c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
 - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
 - f) the right to lodge a complaint with a supervisory authority;
 - g) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the

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significance and the envisaged consequences of such processing for the data subject.

2.

Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

3.

The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

4.

The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

Where applicable, the data subject shall have the rights pursuant to art. 16-21 of GDPR (Right to rectification, Right to be forgotten, Right to restriction of processing, Right to Data Portability, Right to Object) and the Right pursuant to art. 7 of GDPR to withdraw the consent for the Personal Data processing based on express consent.

You shall ask additional information concerning the processing of your Personal Data writing to PALAZZO MORELLI SRL A SOCIO UNICO **using the email: palazzomorelli@legalmail.it**.