



## **COSTAMPRESS S.p.A.**

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### **DISCLOSURE TO CUSTOMERS/SUPPLIERS**

Pursuant to Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data. The processing of data relating to legal persons does not fall under the scope of application of the protection regime of personal data afforded by the Regulation. In the interests of clarity and transparency towards its Suppliers, COSTAMPRESS S.p.A. makes this disclosure also to legal persons, describing the methods and purposes for all processing of personal data carried out or potentially carried out by the Company.

### **INTRODUCTION**

Pursuant to art. 13 of Regulation (EU) 2016/679, COSTAMPRESS S.p.A. (hereafter the "Company"), with its registered office in via G. Taliercio 13 – 30037 Gardigiano di Scorzè – Venice – Italy, which may be contacted for the exercise of the rights granted by current regulations at the address of its registered office or via e-mail at [privacy@costampress.it](mailto:privacy@costampress.it), Data Controller of data that have already been provided or that will be provided in the future and by which all personal data have been or will be collected, would like to inform you that the data that concerns you could be processed, pursuant to the aforementioned regulation, by the Company in relation to contractual relationships that it has concluded with you or that may be concluded in the future.

### **1. SOURCE OF THE PERSONAL DATA**

Personal data that have already been acquired or that will be acquired in contractual relationships are collected directly from the data subject. All personal data collected will be processed in accordance with current regulations and, in any case, with due confidentiality.

### **2. NATURE OF THE COLLECTION**

In addition to being necessary for the conclusion and performance of the contractual relationship, the collection of personal data is also mandatory as it is required for the fulfilment of fiscal and obligations of law; refusal to provide said personal data shall hinder the establishment of business relations with the Company. Said processing does not require the data subject's consent.

### **3. PURPOSE OF PROCESSING AND LEGAL BASIS FOR PROCESSING**

The collection or processing of personal data is aimed toward adequately fulfilling the obligations connected to the performance of the business activities of the Company and in particular for:

- a. pre-contractual activities and the acquisition of preliminary information regarding the conclusion of the agreement,
- b. the management of the contractual relationship and of all administrative, operational and accounting activities related to the contract (management of orders, invoicing, check of suppliers' reliability),
- c. the management of disputes, breach of contractual obligations, warning notices, transactions, arbitration, litigation,
- d. the fulfilment of obligations arising from the law, regulations, EU legislation and provisions laid down by authorities.

Processing is carried out in fulfilment of contractual / pre-contractual and legal obligations related to your relationship with the Company.

### **4. NATURE OF THE SUPPLY AND CONSEQUENCES OF EVENTUAL REFUSAL**

Your obligation to supply personal data to the Company applies only to those personal data the supply of which is a legal or contractual obligation, or personal data which is necessary for the acquisition of pre-contractual information following a request by the data subject. Any refusal to supply said "mandatory" personal data may result in the contract not being fully implemented. Any refusal to supply personal data the supply of which is not mandatory but which are necessary for the performance of the contractual relationship shall, in principle, not have any consequence for the current relationship, except for the impossibility to continue operations that are linked to said personal data or the impossibility to establish a new relationship.

Any refusal to supply personal data related to further activities, not strictly necessary for the execution of the contractual relationship, may only prevent such further activities from being carried out without other consequences.

## **5. METHODS OF PROCESSING**

The processing of the data shall be carried out in a lawful and honest manner and in any case in compliance with the abovementioned regulation, by means of instruments apt to guarantee security and confidentiality and may also be performed through automatic devices capable of memorising, managing and transmitting said data.

Processing shall mainly be performed by the company's internal organisation under the management and control of the company departments in charge of the handling of data and for the purposes stated above, and by Companies belonging to the group or by third parties, as mentioned under point 8 below. The data shall be stored in such a way as to enable the identification of the data subject for a time period not exceeding the time necessary for the purposes for which said data were collected and processed.

## **6. DURATION OF PROCESSING**

The personal data that are processed will be stored for the period of time that is strictly necessary for the contractual relationship and, subsequently, for the fulfilment of all legal obligations linked to or arising from the contract that has been concluded by and between you and the Company.

## **7. RECIPIENTS OF THE PERSONAL DATA**

In addition to disclosure for the purpose of fulfilling an obligation of law, regulation or European Community standard as well as intra-group standards, your data may be disclosed—even via simple reference to them or by rendering them available—to the following subjects:

- a. supervisory authorities and bodies or public institutions,
- b. Companies controlled by or linked to our Company, whether in Italy or abroad,
- c. natural or legal entities that provide specific services: data processing, logistics and postal services, Customer satisfaction surveys, legal, administrative, tax and/or accounting consultancy, organisation of fairs and communication events,
- d. commercial middlemen, banks and credit institutes, financial brokerage firms, individual persons or corporate bodies in charge of credit collection, auditing and/or certification of balance sheets and quality system certification, independent collaborators of the Company, agents and procurers, insurers and brokers,
- e. natural and/or legal persons under the implementation of supply contracts to its clients by COSTAMPRESS S.R.L.

The subjects under points **a. d. and e.** act as independent Data Controllers. In any case, we assure you that the data that may be disclosed to the abovementioned subjects will be only aggregate data or anonymous data and/or data necessary and pertinent to the purpose of the processing they need to carry out. The list of said subjects will be constantly updated and be made available to you on simple request to the Company.

Due to the existence of links to the aforementioned subjects via electronic, IT means or correspondence, the personal data may be transferred abroad, even to non-EU countries. In any case, personal data will not be disclosed.

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

You retain your right to exercise the rights of access to the personal data stipulated by article 15 of Regulation (EU) 2016/679 and the rights stipulated by articles 16, 17, 18, 21 of Regulation (EU) 2016/679 regarding the rectification, erasure, limitation of processing and the right to object, with the arrangements laid down in article 12 of Regulation (EU) 2016/679.

## **9) RIGHT TO LODGE A COMPLAINT WITH THE AUTHORITY FOR THE PROTECTION OF PERSONAL DATA PURSUANT TO ARTICLE 77 OF THE REGULATION (EU)**

If our Company does not respond within the deadlines set by the law or you do not deem said response regarding the exercise of your rights to be adequate, you may lodge a complaint with the Authority for the protection of personal data.

At the following address:

Authority for the protection of personal data  
121, Piazza di Monte Citorio - 00186 Rome  
www.gpdp.it - www.garanteprivacy.it  
✉ [garante@gpdp.it](mailto:garante@gpdp.it)  
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