

PROCESSING OF PERSONAL DATA –

INFORMATION FOR CUSTOMERS in accordance with Article no. 13 of Regulation (EU) 2016/679

Dear Customer,

In accordance with General Data Protection Regulation no. 679 of 2016, and in particular as required by Article 13, with this document **Plastidue S.r.l. Unipersonale** (tax code and VAT no. 00595000266, with its headquarters in Via Giulio Pastore 35, Montebelluna 31044 Treviso, Italy, tel. (39) 0423 302644, e-mail info@nearbygroup.it, hereafter referred to as The Company), informs you that it is The Controller of any personal data you will provide, relating to the establishment and management of our business relationship. In accordance with the existing rules, The Company will process your data under the principles of lawfulness, fairness and transparency as well as the other principles stated in Article 5 of GDPR 679/2016. The Company will give you the following information:

A) Personal data processing

“Processing” indicates, as stated in Article 4 no. 2 of Regulation (EU) 2016/679, any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Your personal data will be processed – in such a way as to guarantee maximum security and reserve and in respect of the provisions of Regulation (EU) 2016/679 – with the support of material on paper or through telematic, software and automated tools set up to store or transmit. When your data is collected using software and/or telematic applications such as PC, notebook, tablet, mobile phone, SIM card, internet key, e-mail and internet connection, it may be seen by the IT service providers, hardware or software, designated as Processors.

You will only be asked for the data which is essential in order to provide the service required, such as your name, address, tax code, VAT number, IBAN code and other personal identification details, like your telephone number and e-mail address.

B) Purpose of processing.

The Controller will process the Subjects-Clients’ personal data in order to perform the service requested, besides allowing The Company to carry out all the various administrative, commercial, accounting and fiscal duties deriving from and connected to the service requested by the Subjects-Clients.

Furthermore, in accordance with Article 130, comma 4 of Legislative Decree no. 196/2003 (as modified by Legislative Decree no. 101/2018) by which “*if the Controller, in order to sell their products or services directly, uses the e-mail address provided by the data Subject within the context of the sale of a product or a service, it may not require the consent of the data Subject, as long as the services requested are the equivalent of those which are the subject of the sale and as long as the data Subject, once they have been suitably informed, does not refuse this use, either initially or for any subsequent communication. The data Subject, at the time of collection and at the time of sending any communication made for the purposes referred to in this paragraph,*

is informed that they may object to processing at any time, easily and free of any charge". The Company will use your personal data (the e-mail address you provided within the context of the sale of a product or a service) **to provide information, by sending commercial information or advertising material, concerning products/services sold by The Company and the equivalent of those which are the subject of the sale as long as you refuse to give your consent for the abovementioned purpose.**

C) *Subjects in charge of processing - Processors*

All those who The Company has designated as "Processors" may be granted access to your personal data. The Processors, identified according to their individual work aim and profile, will act under the authority of The Controller and in accordance with Articles 29 and 32 of Regulation (EU) 2016/679. Your personal data will be handled by The Processors upon The Controller's authorisation and in accordance with the latter's instructions.

D) *Subjects that the data is provided to – Recipients*

The undersigned Company, as The Controller, will perform certain activities relating to the processing of your personal data. In order to do so, The Company may communicate this data to other subjects who carry out activities that are strictly connected to, or useful or necessary for the provision of the service and/or operations which may be requested by you and, as a consequence, necessary for the correct fulfilment of the contractual commitments made by The Company to you. These include, but are not limited to, the following:

- transport and shipping companies;
- subjects, operating on behalf of our Company, that provide specific processing or consultancy services for business, legal or fiscal/tax administration and management;
- subjects that provide processing services and/or maintenance of the business information systems;
- companies which supply the IT security systems;
- credit institutions;
- collection agencies;
- associated or subsidiary companies;
- public or private bodies (in order to comply with law obligations).

An updated list of said subjects can be requested from the Company as the Controller. The Company will also identify among the subjects those who operate as "Processors", as they process data in lieu of the Company. Processors selected by the Company conform their technical and management measures to the requirements of the Regulation (EU) 2016/679 and to guarantee the protection of Your personal data. Processing subjects, having subscribed to the Controller's letter of appointment, fulfil all specific obligations listed in Article 28 of Regulation (EU) 2016/679 and to act, in accordance with Article 29 of Regulation (EU) 2016/679 under the authority of the Controller and at the instruction of the Controller, communicating to the Controller any violation of Your personal data in accordance with Article 33 of Regulation (EU) 2016/679.

E) *Transfer of data abroad*

Should the Controller deem necessary, in order to provide the service, to transfer the personal data outside EU (where in "transfer the personal data outside EU" is included the use of extra-EU Countries-based data storage system services such as hosting, cloud and/or storage), the Controller undertakes to adopt safeguards to make the transfer safe and to ensure that the processing is performed in accordance with the General Data Protection Regulation (in terms of adequacy, contractual clauses, consent, etc...).

F) Rights of the data Subject

At any moment you can exercise your rights with regard to The Controller of personal data processing in compliance with Article 15 at seq. of Regulation (EU) 2016/679 (access to personal data, rectification or erasure, restriction of processing, opposition, data portability).

At any moment, if you assume that your rights have been violated as a consequence of processing, you can issue a complaint (according to the Article 77 of the Regulation (EU) 2016/679) or a judicial appeal (according to Article 79 of the Regulation (EU) 2016/679) to the relevant supervising Authority.

G) Data storage period

Your personal data will be stored for the time prescribed by legal obligations and, in any case, for as long as necessary in order to provide the service you requested, as well as for the achievement of the aims referred to in point B.

H) Compulsory data and legal grounds for processing

The Company informs you that the provision of your personal data is a contractual obligation, since this provision is essential to finalise the contract and, as a consequence, to provide the service you required; any refusal to communicate your personal data would make The Company unable to provide the service you requested.

The legal grounds which allow The Company to process your personal data consist of:

- the need to fulfil a contract to which you, as data Subject, are party (Article 6, point B of Regulation EU 2016/679);
- the compliance with a legal obligation to which the Controller is subject (legal grounds referred to in Article 6, comma 1, point C of Regulation EU 679/2016);
- the legitimate interests of The Controller in pursuing the objectives of the agreement between The Company and you, as data Subject, and in sending you commercial information or advertising material (legal grounds referred to in Article 6, comma 1, point F of Regulation EU 679/2016);

The Controller

Signature of the Legal Representative

Plastidue S.r.l. Unipersonale.

The Customer confirms that they have received complete information in accordance with Article 13 of Regulation (EU) 2016/679.

For acknowledgement and acceptance of the privacy policy

Client, Mr./Mrs. _____

Signature _____