

# INFORMATION ON THE PROCESSING OF PERSONAL DATA - PRIVACY POLICY

(Privacy Code - Legislative Decree 30.6.2003, n. 196 - Art. 13 - EU Regulation 67912016 - Art. 13)

We are aware of how important the ways in which information about you are used and shared are to you and we appreciate the trust you place in us in doing so scrupulously and responsibly.

This privacy policy describes how we collect and process your personal data.

## WHO IS THE OWNER?

Below is the main information, pursuant to art. 13 Legislative Decree 30.6.2003 n. 196 (hereinafter, "Privacy Code") and art. 13 EU Regulation no. 2016/679 (hereinafter, "GDPR"), on the processing of your personal data carried out by Agade Srl, based in Via Antonio Mambretti, 32 - 20157 Milan, CF / PI 11236320963 as Data Controller (hereinafter, "Holder").

For any clarification, question or need related to your privacy and the processing of your personal data, you can contact us at any time by sending a request to the email address [legal@pec.ogade.eu](mailto:legal@pec.ogade.eu) or by writing to the address of the Data Controller's office.

## WHAT DATA DO WE PROCESS?

Personal data, including particular ones, example code, name, surname, company name, address, telephone number, e-mail address, bank and payment details, information relating to solvency, general and specific information on the interested parties aimed at the correct execution of the contract) - subsequently, "personal data" or even "data" communicated when concluding contracts for our services.

The processing of personal data means any operation or set of operations, carried out with or without the aid of automated processes and applied to data or sets of data, even if not registered in a data bank, such as collection, registration, the organization, structuring, storage, processing, selection, blocking, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, restriction, deletion or destruction.

## PURPOSE OF THE TREATMENT AND METHOD OF CONFERRING

Your personal data are processed without your express consent (Article 24 letter a), b), c) Privacy Code and art. 6 lett. b), e) GDPR), for the following service purposes:

- conclude contracts for the Controller's services;
- fulfill the pre-contractual, contractual and tax obligations deriving from existing relationships;
- fulfill the obligations established by law, by a regulation, by community legislation or by an order of the Authorities;
- exercise the rights of the owner, for example the right to defense in court.

In the aforementioned cases, the processing of your personal data is legitimate as it is necessary to execute a contract with you or to provide you with the service you have specifically requested from us. Any refusal to provide them in whole or in part may make it impossible for the Owner to execute the contract or to correctly carry out all the obligations connected to the contract.

## HOW THEY ARE TREATED YOUR PERSONAL DATA

The gifts will be treated by means of the operations indicated in art. 4 of the Privacy Code and art. 4 n. 2 GDPR, i.e. both manually and electronically with the aid of electronic and stored tools both on computer media and on paper and on any other type of suitable support, in compliance with the minimum security measures.

We are committed to protecting the interests of the individuals whose data is processed. In particular, we guarantee that the data collected are:

- processed in compliance with applicable regulations and processed lawfully and transparently;
- collected for the purposes provided for by law;
- subjected to processing only for the intended purposes and within these limits;
- adequate, appropriate and necessary in relation to the purposes for which they are processed;
- stored in such a way as to facilitate the identification of the persons with respect to whom the data are processed from time to time, and in any case as long as they are necessary for the purposes of the processing for which they were collected and no later than;
- processed in such a way as to guarantee the security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organizational measures.

We will process your personal data for the time necessary to fulfill the purposes described. In any case, for the activities of administration, accounting, contracts and labor law, management of any litigation, the Law in art. 2220 CC establishes the term of 10 years of conservation without prejudice to any delayed payments of the fees that justify the extension.

#### **WHO CAN ACCESS YOUR PERSONAL DATA?**

Our employees (and any collaborators) may become aware of your personal data, as authorized and / or data processors, exclusively in relation to the tasks they perform and the purposes expressed above.

Some specific categories of external subjects or our company may also become aware of your personal data, as external managers, always for purposes connected with the execution of obligations deriving from existing work relationships. The external managers have been evaluated and chosen by our company for their proven reliability and competence. The updated list of external managers and data processors is kept at our headquarters.

#### **WHAT ARE YOUR RIGHTS?**

As an interested party, you have the rights referred to in art. from 15 to 22 of the GDPQ and precisely the following rights:

- right of access;
- right of rectification;
- right of cancellation;
- right to limitation of treatment;
- obligation to notify in order to correct or cancel personal skills or limit the processing;
- right or data portability;
- right to object.

This information may undergo changes and additions over time. Where possible, we will try to inform you promptly of the changes made.