

# MANUALE PRIVACY

Documentazione redatta in ottemperanza a quanto disposto dal GDPR 2016/679 "Regolamento generale sulla protezione dei dati" e dalla normativa nazionale vigente

**UNIVITI SRL**

Via A. Volta, 1/c  
31027 Spresiano (TV)  
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eM.: info@univiti.it

**OBJECT: Data Processing Policy pursuant to and in accordance with artt. 13 and 14 GDPR 2016/679 and current national legislation concerning data protection.**

With this policy UNIVITI SRL provides the Data Subject with the data processing information referred to in artt. 13 and 14 GDPR 2016/679.

## Data Controller.

The Data Controller is UNIVITI SRL, headquarters in Via A. Volta, 1/c - 31027 Spresiano (TV).

## Purposes and lawful basis of the processing.

The data are collected and processed in order to pursue:

1. compliance with legal obligations, including but not limited to tax legislation applicable when conducting business activities and anti-money laundering legislation (processing is necessary for compliance with a legal obligation to which the Controller is subject in accordance with art. 6 par. 1 let. c) GDPR 2016/679);
2. the establishment and performance of on-going contractual relationships, as well as potential pre and post sale assistance (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract in accordance with art. 6 par. let. b) GDPR 2016/679) (processing is necessary for compliance with a legal obligation to which the Controller is subject in accordance with art. 6 par. 1 let. c) GDPR 2016/679);
3. managing relationships with the Supplier, including but not limited to administration, accounting, orders, shipping, invoices, services, and out-of-court settlements where provided (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract in accordance with art. 6 par. let. b) GDPR 2016/679);
4. judicial litigation where applicable (processing is necessary for the purposes of the legitimate interests pursued by the Controller in accordance with ex art. 6 par. 1 let. f) GDPR 2016/679, strictly limited to the establishment, exercise or defence of legal claims);

The collection and registration of data will be carried out for specified, explicit and legitimate purposes and in a manner that is compatible with these purposes, in relation to the processing that is required for conducting business activities. So that the data are accurate and, where necessary, kept up to date. So that the data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are collected and subsequently processed in accordance with GDPR 2016/679 and current national legislation.

Personal data may be processed with both paper and telematic means, or in any case with means suitable for recording and memorizing the data, and, in any case, their safety is guaranteed, and the utmost confidentiality of the data subject is protected. Specific security measures are observed to prevent data loss, unlawful or incorrect use, and unauthorized access in full compliance with art. GDPR 2016/679 and the current national legislation.

## Mandatory or optional nature of the provision of personal data and consequences of failure to provide such data.

The provision of personal data is mandatory in order to comply with legal obligations and to establish or perform the contractual relationship. Failure to provide such data will make it impossible for the Company to take steps at your requests or to perform the contract.

## Recipients or categories of recipients of personal data.

Without prejudice to current legislation and in particular to the principles stated in art. 5 GDPR 2016/679, all collected and processed data may be communicated in Italy and/or abroad, exclusively for the purposes stated in this policy, to the following recipients:

- Companies belonging to the same corporate group;
- Subjects to whom it may be necessary to communicate the data for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, as well as for the purposes stated in this policy;
- Subjects appointed as credit managers, such as factoring companies, lenders, debt collection companies, credit insurance companies, commercial information companies;
- In particular, subject who are processing data on behalf of the Controller as Data Processor under art. 28 GDPR 2016/679, including but not limited to professional and/or Company operating in the following fields: accounting, legal, operational, technical, information technology. The complete and up-to-date list of the Data Processors is available, upon request of the right holders, at the headquarters of the Data Controller.
- Subjects who are legally entitled to access the data in accordance to current legislation and/or to whom the data shall be communicated for compliance with a legal obligation to which the Controller is subject;

Personal data may be processed by employees and co-workers assigned to the competent Company offices, explicitly authorized in accordance with art. 29 GDPR 2016/679 and current national legislation.

## Transfers of personal data abroad.

Your data may be communicated and/or transferred abroad only for the purposes stated in this policy or for strictly technical reasons due to the structure of the company IT System and/or for the implementation of technical and organisational measures which the Data Controller has deemed adequate (art. 32 GDPR 2016/679), exclusively in accordance to artt. 44 s.s. GDPR 2016/679.

## Data retention.

Without prejudice to art. 5 GDPR 2016/679, provided data shall be retained in our filing systems according to the following parameters:

- Data processed for activities pertaining to administration, accounting, orders, quotations management, production flow management, assistance and maintenance, shipping, invoice, services, litigation: 10 years as established by law (art. 2220 Civil Code), without prejudice to potential payment delays, which justify extensions;
- Data processed for the assessment of the supplier: 36 months;
- Other data not mentioned above, processed for contractual purposes: until contract expiration and/or for the duration of the commercial relationship connected to the supply.

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UNIVITI SRL			Partita IVA/C. Fiscale: 03405310263

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In relation to the specific statutes of limitation provided for by law, the data retention period may be extended if the data is necessary for the establishment, exercise or defence of legal claims.

Verifications on data obsolescence in relation to their purposes are performed periodically.

#### **Rights of the data subject.**

In relation to such personal data, the Data Subject can exercise his rights within the conditions set by artt. 15-22 GDPR 2016/679 and current national legislation. Specifically, the GDPR recognizes the following Data Subject rights:

- Right of access by the data subject (art. 15 GDPR 2016/679);
- Right to rectification (art. 16 GDPR 2016/679);
- Right to erasure (art. 17 GDPR 2016/679);
- Right to restriction of processing (art. 18 GDPR 2016/679);
- Information about the recipients of the notification regarding rectification or erasure of personal data or restriction of processing, upon request of the Data Subject (art. 19 GDPR 2016/679);
- Right to data portability (art. 20 GDPR 2016/679);
- Right to object (art. 21 GDPR 2016/679);
- Right not to be subject to a decision based solely on automated processing, including profiling (art. 22 GDPR 2016/679).

In the case of signing any kind of consent to data processing upon request of UNIVITI SRL, it shall be noted that the Data Subject may withdraw it at any time, without prejudice to mandatory obligations in accordance with legislation applicable at the time of the request, by contacting the Data Controller at the following e-mail address: info@univiti.it.

#### **Right to lodge a complaint.**

If any data subject considers that the processing of personal data relating to him or her infringes GDPR 2016/679, he or her shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement, pursuant to art. 77 GDPR, or to refer to the competent courts (art. 79 GDPR 2016/679).

Spresiano, 02/02/2022

UNIVITI SRL

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