

INFORMATION FOR THE PROCESSING OF PERSONAL DATA

pursuant to Article 13 of Legislative Decree no. 196/03 and EU Regulation no. 679/2016

GEM Elettronica srl, with registered office in San Benedetto del Tronto (AP), Via Amerigo Vespucci n.9, VAT IT00360680441 (hereinafter "**Controller**"), as data controller, informs you pursuant to art 13 of Italian Legislative Decree n° 196 of 30.6.2003 (hereinafter, "**Privacy Code**") and art 13 of Regulation (EU) 2016/679 (hereinafter, "**GDPR** ") that the data you have provided or acquired by the Controller during the contractual or pre-contractual relationship will be processed by the following means and for the following purposes:

1. Scope of processing

The Controller processes personal data, identification (for example, name, surname, company name, address, telephone, e-mail, bank and payment details) - later, "**personal data**" or even "**Data**" provided by you:

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

- conclude the contracts for the goods and services provided by the Controller
- fulfill the pre-contractual, contractual and tax obligations arising from relations with you to be
- formulation of offers and other activities aimed at establishing the contractual relationship for the supply of the products and / or services of the Owner;
- fulfill the obligations established by law, by a regulation, by community legislation or from an order of the Authority (such as for anti-money laundering);
- exercise the rights of the Controller, for example the right of defense in court.

2. Processing method

The Controller will process personal data in accordance with the principles of lawfulness, fairness and transparency.

Your personal data are processed by means of the following operations: collection, recording, organization, structuring, storage, consultation, adaptation or alteration, use, dissemination, disclosure by transmission, retrieval, alignment, combination, restriction, erasure and destruction of the data.

Your data personnel are subjected to treatment by using tools and procedures suitable to guarantee their security and confidentiality and can be carried out either by paper means, or through the use of electronic tools. The same procedures are also used when the data will be communicated for the aforementioned purposes to external parties that perform specific treatments on behalf of the company, operating in Italy or abroad as independent Controllers. The data are processed by employees or collaborators within the scope of their functions and in accordance with the assignments received, always and only for the achievement of the specific purposes related to the satisfaction of the existing contractual relationship.

3. Data retention period

The Data Controller will process the personal data for the time necessary to fulfill the aforementioned purposes and in any case for no more than 10 years from the termination of the relationship for the purposes of service. After 10 years from the termination of the contractual relationship, access to data will be limited to those responsible for the function.

4. Access to data

Your data may be made accessible for the purposes referred to in art. 1:

- to employees and collaborators of the Data Controller or of any companies of the Controller's Group and abroad, in their capacity as persons in charge and / or internal managers of the processing and / or system administrators;
- to third-party companies or other subjects (by way of example: credit institutions, professional firms, consultants, insurance company for the provision of insurance services, etc.) which carry out business in outsourcing on behalf of the Controller, in their capacity as external processors.
- public entities, for fulfilling legal obligations.

Without requiring your explicit consent, the Controller may communicate your data for the purposes referred to in art. 1 to supervisory bodies, judicial authorities, credit institutions, insurance companies for providing insurance services, as well as to those entities to which communication is mandatory in terms of the law for carrying out said purposes.. These subjects will treat the data in their quality of autonomous Controllers of the treatment.

5. Transfer of data

Personal data are stored on servers located at the Controller's headquarters, as above indicated, or on cloud servers, however within the European Union. In any case, it is understood that, should this be necessary, the Controller will have the right to move the servers even outside the EU. In such a case, the Controller hereby guarantees that transfers of data outside the EU will be done in accordance with the applicable laws, also by means of including standard contractual clauses provided for by the European Commission, and adopting binding corporate rules for intra-group transfers.

6. Consent

The provision of data and related processing for the purposes indicated in point 1 is necessary in order to guarantee the Controller's services you have requested, and for executing the requests made. If refused, you cannot successfully submit requests and cannot receive a response from the Controller.

7. Rights of the interested party

In your capacity as the data subject in processing of the data in question, you have the rights provided for in the GDPR, including the right to ask the Data Controller:

- I. to obtain confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
- II. to obtain the indication: a) of the origin of personal data; b) of the purposes and methods of the processing; c) of the logic applied in case of treatment carried out with the aid of electronic instruments; d) of the identification details of the Controller, the managers and the designated representative; e) of the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as designated representative in the territory of the State, managers or agents;
- III. to obtain: a) updating, rectification or, when interested, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also

as regards their content, of those to whom the data have been communicated or disseminated, except in the case where such fulfillment is it proves impossible or involves a use of means manifestly disproportionate to the protected right;

- IV. to object, in whole or in part: a) for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by email and / or through traditional marketing methods by telephone and / or paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the data subject to exercise the right to object even only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or none of the two types of communication.
- V. Where applicable, you also have the rights pursuant to art. 7 of the Privacy Code and art. 15 – 21 of GDPR, as well as the right to lodge a complaint with the competent Authority pursuant to art. 77 of GDPR.

8. Procedure for exercising rights and communications

You may contact the Data Controller at any time, using the following procedures:

- by sending a registered letter with notification of receipt to GEM elettronica srl, Via A. Vespucci, 9, 63074 San Benedetto del Tronto (AP);
- by sending an e-mail message to privacy@gemrad.com

Finally, if you consider that the processing of the supplied data violates the legislation regarding the protection of personal data, you have the right to propose a complaint to the Guarantor for the protection of personal data (www.garanteprivacy.it).

9. Modifications to this information

In a world of continuous technological changes, we may need to update this Notice periodically. We invite you to check online for the latest version of the Statement and we will inform you of any substantial changes through our website <http://www.gemrad.com/privacy-policy/>.

10. Data Controller



The data controller is GEM Elettronica srl, whose registered office is in San Benedetto del Tronto (AP) Italy, Via Amerigo Vespucci n.9.

The updated list of data processors is kept at the headquarters of the Data Controller.

Yours sincerely,

Signature of the Data Controller

GEM elettronica S.r.l.



Giuseppe Merlini
CEO GEM elettronica S.r.l.