**PRIVACY INFORMATION FOR CUSTOMERS**

(Articles 13 and 14 of EU Regulation 2016/679)

Dear Customer,

having expressed interest in our products/services, even for consultative and pre-contractual purposes only, we wish to inform you of the methods of processing and management of your personal data that we collect, if and as necessary, pertinent and proportionate to be able to comply with your needs and implement our legitimate interest in the correct execution of the contractual relationship.

**1. Purpose, legal basis of the processing for which the data are intended. Source**

In order to fulfill and comply with your requests for information already in the pre-contractual phase, we collect common data such as name, surname, telephone, email, preferences and personal needs related to the product or service you are interested in. Upon conclusion of the order or contract, additional data necessary to comply with our obligations will then be collected, such as for example data on commercial reliability, absence of protests or prejudicial elements against you which could compromise the smooth running of the contract and payment and all the elements and qualifications and personal status if and as strictly necessary for the provision of the service and/or sale of the product.

The data collected by third parties comes only from public databases or from information you have made available and already disseminated, except that it is not necessary to proceed with investigations for the protection of our credits and therefore acquire data for the purpose of defending our rights.

We therefore inform you that personal data is being processed

A) without your consent for the following purposes:

- allow us to process your requests and comply with pre-contractual and contractual obligations; (art. 6 letter b) GDPR)

- allow us to exercise rights such as for example that of defense in court against even attempted frauds. (art. 6 letter c) GDPR)

- allow us to contact you again to provide updates on your requests and if you are already our customer, for commercial communications relating to services and products similar to those you have already used, unless you disagree (Article 6 letter f) GDPR)

B) only with your specific and distinct consent, for the following Purposes:

\*) Send you commercial communications by mail, fax, telephone, push notifications, relating to our products and services (marketing);

\*\*) send you commercial communications, promotional initiatives, commercial information, market research, offers of products and services from third-party companies with which commercial agreements have been concluded in this sense (third-party marketing), to whom we will communicate your data of contact;

\*\*\*) data processing in order to display the commercial reference for advertising purposes.

For each of these purposes you will be required to express your consent.

**2. Legitimate interest of the treatment**

The EU Regulation 2016/679 also allows the data controller to process data of interested parties regardless of their consent (provided they do not belong to the category referred to in Article 9 of the GDPR), even where a legitimate interest of the Data Controller or a third party is pursued. third. In our case, this interest is identified with the need to comply with the quality, security, data processes necessary to prevent any fraud, recover credit also through agencies, lawyers, investigation and recovery companies. The relevance, accuracy, veracity of personal data concerning you is essential for us for our own security.

**3. Nature of personal data**

Your personal data, common and with prior consent those data of a particular nature pursuant to art. 9 GDPR

During the provision of the service it may be necessary to acquire and carry out processing operations on your sensitive personal data. You are asked to express your consent in writing.

**4. Mandatory or optional nature of the provision**

The provision of your personal and sensitive data is not mandatory, but any refusal could make the provision of the services you requested impossible or extremely difficult.

**5. Scope of communication and dissemination of data**

Your data may be communicated to:

• all subjects to whom the right to access such data is recognized by virtue of regulatory provisions;

• to employees and collaborators of the Data Controller, in their capacity as persons in charge and/or internal data processors and/or system administrators;

**6. Transfer of personal data to a third country.**

The management and storage of personal data will take place on servers located within the European Union of the Data Controller and/or third-party companies appointed and duly appointed as Data Processors. Currently the servers are located in Italy. The data will not be transferred outside the European Union.

**7. Method and duration of retention of personal data**

The Data Controller will process the personal data for the time necessary to fulfill the aforementioned purposes and in any case will keep them for no more than six months from the termination of the relationship for the Service Purposes and for no more than 10 years from the collection of data for the Marketing Purposes

**8. Identification details of the holder**

The Data Controller is our company Igiene Service srl, VAT number and CF 01711810497, based in Portoferraio, (LI), Largo Pianosa, 3, email info@gieservice.net, pec.: igieneservice.srl@pec.it, which has designated the legal representative as the person responsible for the processing.

**9. Rights of the interested party**

Except in cases of legal obligations, public interest or exercise of public authority, you have the right, at any time, to revoke your consent to data processing by sending a request by registered letter with return receipt to the address of the data controller or your certified e-mail and, in this case, the lawfulness of the treatment based on the consent expressed before the revocation is not affected. The art. 15 of the GDPR grants you, as an interested party in the treatment, the exercise of specific rights, including that of obtaining from the owner confirmation of the existence or otherwise of your personal data and their making available in an intelligible form; the right to know the origin of the data, the purposes and methods of the processing, the logic applied to the processing, the identification details of the owner and the subjects to whom the data may be communicated; the right to obtain the updating, rectification and integration of data, cancellation, transformation into anonymous form or blocking of data processed in violation of the law; the right to object, for legitimate reasons, to the processing of your data.

 The GDPR provides for the right to have your data forgotten (art. 17), to their limitation (art. 18), to their portability (art. 20) and, in the event of an automated decision-making process (so-called profiling), to their humane treatment (Article 22).

The exercise of rights is not subject to any formal constraint and is free.

**10. Response times to requests**.

In the event of a request from you for information relating to your data, the owner will reply as soon as possible - unless this proves impossible or involves a disproportionate effort - and, in any case, no later than 30 days from the request. Any impossibility or delays by the owner in satisfying the requests will be justified

**11 Complaints and Appeals**

If you feel harmed in one of the rights listed in point 9, you can lodge a complaint with the Guarantor for the protection of personal data (following the procedures and indications published on the Authority's website at www.garanteprivacy.it) or an appeal administrative or judicial.

Last updated September 2023.

**CONSENT TO DATA PROCESSING**

The undersigned (First name): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ (Last name) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(CF: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_);

Email\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_; :Mobile/phone:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_;

Declares that I have read this information; I understand and unreservedly accept the processing of my personal data for the purposes and legitimate interests referred to in the information notice points 1A)

With reference to the purposes referred to in point 1B) for which my consent is required:

A) to the processing of sensitive and judicial data necessary, pertinent and not excessive, which are necessary to inform my position and offer feedback to my needs (\*);

 □ I give my consent □ I do not give my consent

I am also aware that, in the absence of my consent - in cases where it is still required - the Data Controller will not be able to carry out the requested service.

B) for the processing and communication, including electronic communication, of my data for the purposes of promotional initiatives, commercial information, the offer of products and services of the Data Controller, also with automated communication systems, such as e.g. email (\*\*). NB: With reference to the contact details provided by me to the Data Controller, it is my right to modify the consent or provide the Data Controller with other ones in the future to replace it. In this case, my consent to their use also for promotional purposes will continue to apply to them unless I expressly declare to the Owner to revoke it.

 □ I give my consent □ I do not give my consent

C) treatment, including the communication of my common data (not sensitive or judicial), for the purpose of promotional initiatives, commercial information, market research, offers of products and services from third-party companies with which commercial agreements have been concluded in the sector of Advertising, Marketing, Finance and Business Services (\*\*\*)

 □ I give my consent □ I do not give my consent

Signature\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Place \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_