

INTRODUCTION

Pursuant to art. 13 of Regulation EU 2016/679 (GDPR), your personal data will be processed on the basis of the principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimisation, accuracy, integrity and responsibility, protecting the confidentiality and rights of the data subjects.

THE CONTROLLER

The Personal Data Controller is Caleffi SpA.

PURPOSE, LEGAL BASE AND CATEGORIES OF PERSONAL DATA

Your personal data is processed for entry in the customer and supplier archives to manage precontractual (offers and quotations) and contractual (sales/purchase of products and services) matters as well as for internal operational and managerial needs, for accounting, tax, civil law purposes and similar requirements.

Your data will be processed by specifically appointed staff, using paper or electronic methods.

Your data must be provided in order to fulfil the obligations arising from the contractual relations.

If you do not provide your data, we may not be able to perform all or part of the contract or proceed with our relations.

DATA SHARING AND THE TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

The data processors to whom your (personal, accounting and tax) data may be disclosed are: employees working in the administrative and commercial departments of our company, external subjects who may perform tax, accounting or IT services on behalf of our company, as well as transporters, credit institutes to manage payments and collections, other subjects who have the right of access to your data pursuant to specific legal provisions or regulations, and any other subjects provided for by law.

Your data will not be disclosed to other third parties or be processed outside of the EU.

RETENTION OF PERSONAL DATA

The data collected shall be duly stored for a maximum period of 10 years or other variable term according to the criteria of balancing the legitimate corporate interests (linked to tax checks, any special commercial correspondence, or specific disputes including disputes, defaulting payments, legal aspects, periodical purchases, statistical, productive or quality purposes).

RIGHTS OF THE DATA SUBJECTS

Pursuant to art. 13(2) lett. b), c), d) of Reg. EU 2016/679, you may contact the Controller in relation to any of the following rights relating to the processing of personal data:

- right of **access** (art. 15);
- right to **rectification** (art. 16);
- right to **erasure** (art. 17);
- right to **restriction** (art. 18);
- right to **data portability** (art. 20);
- right to **object** (art. 21);
- right to **lodge a complaint with a supervisory authority** (art. 77);
- right to **withdraw consent**, in the cases provided for in art. 6(1) lett. a) or art. 9(2) lett. a)

For information or to exercise the rights granted under the GDPR, please contact the Caleffi Privacy Team using the following e-mail address: privacy@caleffi.com