PRIVACY POLICY FOR THE PROCESSING OF CUSTOMERS' PERSONAL DATA PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679 "GDPR"

DATA CONTROLLER

Camuna Cavi S.r.l

via General Treboldi, n.128 Edolo (BS) E-mail: titolare-dati.it.cce@lapp.com ("Company" or "Camuna Cavi").

	PURPOSE OF THE PROCESSING	<u>=</u>	LEGAL BASIS OF THE PROCESSING	<u>(1)</u>	DATA RETENTION PERIOD
Purposes related to the establishment and execution of the contractual relationship between the Customer and the Company.		Execution of the contract for the data of the legal representative. Legitimate interest in the data of the Customer's employees/consultants involved in the activities referred to in the contract		Contract term and, after termination, for a further 10 years. In the case of a legal dispute, for the entire duration of the same, until the exhaustion of the terms of availability of the appeal actions.	
Fulfil obligations under regulations and applicable national and supranational legislation.		Need to fulfil legal obligations		Contract duration and, after termination, for the ordinary limitation period of 10 years. In the case of a legal dispute, for the entire duration of the same, until the exhaustion of the terms of availability of the appeal actions.	
If necessary, to ascertain, exercise or defend the Data Controller's rights in court		Legitimate interest			
Out of court debt recovery		Legitimate interest			
Sending, by e-mail, commercial communications relating to products similar or complementary to those purchased.		Legitimate interest of the Data Controller ("soft spam" pursuant to Article 130, paragraph. 4, Legislative Decree 196/03, as modified by Legislative Decree 101/2018, so- called Privacy Code), given the interest of customers to be informed of products similar or complementary to those previously purchased.		The data processed for this purpose will be kept until the opposition exercised by the Data Subject.	

Once the above storage terms have elapsed, your data will be destroyed or anonymised compatibly with the technical deletion and backup procedures.



MANDATORY PROVISION OF DATA

The provision of your data requested in the registration form or provided by telephone to customer services is mandatory for the conclusion of the contract; therefore, refusal to provide the data mentioned above makes it impossible to execute the contract.



DATA RECIPIENTS

The data can be processed by external subjects operating as Data Controllers such as, for example, other companies belonging to the group, authorities and supervisory and control bodies and in general private or public subjects entitled to request the data.

The data may also be processed, on behalf of the Company, by external subjects designated as processors, to whom adequate operating instructions are given. These subjects are essentially included in the following categories:

- a. companies that provide e-mail sending services;
- b. companies that provide assistance to the e-mail client and CRM.



SUBJECTS AUTHORISED TO PROCESS

The Data may be processed by the employees of the corporate functions appointed to pursue the aforementioned purposes, who have been expressly authorised to process and who have received adequate operating instructions.



TRANSFER OF PERSONAL DATA TO COUNTRIES NOT BELONGING TO THE EUROPEAN UNION

As a rule, the data will not be transferred abroad to non-European countries. If data is transferred to non-EU countries, this transfer will take place in compliance with the conditions provided for under the GDPR.



DATA SUBJECT'S RIGHTS - COMPLAINT TO THE SUPERVISORY AUTHORITY

By contacting the Data Protection Committee by e-mail at the address <u>titolare-dati.it.cce@lapp.com</u>, data subjects can ask the data controller for access to his or her data, deletion of the data, correction of inaccurate data, integration of incomplete data, cancellation of data and limitation of processing in the cases provided for by Article 18 of the GDPR, as well as oppose to the processing of data necessary for the pursuit of the data controller's legitimate interest for reasons related to a particular situation.

Furthermore, if the processing is based on consent or on the contract and is carried out with automated tools, the Data Subjects have the right to receive the data they provide in a structured and commonly used format that can be read by an automatic device and, if technically feasible, the right to send them to another controller without hindrance.

Data subjects have the right to object to the processing of data for marketing purposes. In particular, we inform you that, in relation to the promotional communications sent by e-mail, you can object to the processing at any time, easily and free of charge, using the "unsubscribe" function shown at the bottom of each e-mail.

Data subjects have the right to lodge a complaint with the competent Supervisory Authority in the Member State in which they habitually reside or work or in the State in which the alleged violation occurred.