



INFORMATION AND CONSENT ON PERSONAL DATA TREATMENT

AXANA 2000 srl, with legal address in Via Dante Alighieri, 104 and administrative and productive address in Via Albere 3/R - 36060 Romano d'Ezzelino (VI), VAT registration **02844410247** - (next, "**Controller**"), the controller shall inform pursuant to Article 13 D.Lgs. 30.6.2003 n. 196 (next, "**Privacy code**") and pursuant to Article 13 EU regulation n. 2016/679 (next, "**GDPR**") that its data will be processed in the manner and for the following purposes:

1. Subject of Processing

The Controller process personal data, identifying data (like name, last name, address, phone contact, e-mail, sensitive data, etc.)— next, "**personal data**" or "**data**") reported during requested services by the Controller.

2. Purpose of Processing

His/her personal data are processed:

A) Without his/her express consent (art. 24 lett. a), b), c) Privacy Code and art. 6 lett. b), e) GDPR)
For the following Service purposes:

- *Fulfill tax requirements arising from maintained contacts*
- *Fulfill requirements provided for by law, regulation, community legislation or authority order*
- *Exercise Controller's rights, like right of defense in court*

B) Only after his/her specific and distinct consent (art. 23 and 130 Privacy Code and art 7 GDPR),
For the following Marketing purposes:

- *Sending through e-mail, mail and/or phone contact, newsletter, marketing communications and/or marketing material regarding products or services granted by the Controller and detection of satisfaction level regarding service's quality.*
- *We would point out that if you are an existing customer, we could forward commercial communication regarding services and products granted by the Controller analogues to those he's/she's already obtained, unless his/her explicit dissent (art. 130 c. 4 Privacy Code)*

3. Mode of Processing

The processing of his/her personal data is realized through operations specified in the art. 4 Privacy Code and in the art. 4 n. 3) GDPR specifically: *collection, registration, organization conservation, consultation, elaboration, modification, selection, extraction, comparison, utilization, interconnection, lockout, communication, deletion and destruction of the data*. Personal data are processed both on paper and electronically and/or automated. The Controller will process personal data only for the period required to carry out the purposes listed above and not beyond 10 years from the cessation of the purpose's relationship of Services and not beyond 2 years from the collection of Marketing data.

4. Data's access

Data could be made accessible for purposes of which art. 2.A) and B):

- *For employees and staff of the Controller in their quality of internal officers for the process and/or system administration*
- *For third companies or others (indicatively service society IT) carrying out activities in outsourcing on behalf of the Controller, in their quality of external representative of the Process.*

5. Data communication

Without the requirement of an express consent (ex. Art. 24 lett. a) b) d) Privacy Code and art. 6 lett. b) and c) GDPR, the Controller could forward his data for the purpose of which art. 2.A) to supervisory body (such as IVASS), juridical authorities, in insurance company for provision of insurance services as well as those subject whom communication is required by the law for the completion of the given purposes. These entities will discuss data in their capacity as independent Controller of the Process. Data will not be diffused.

6. Data transfer

Personal data will be stored on paper and electronically in Italy, within the European Union. Remains in any event intended that the Controller, if necessary, will have the right to relocate them in non-EU countries. In that case, the Controller shall ensure that the relocation of data in extra-UE countries will be in accordance with the provisions of the applicable law, prior signature of the standard contract terms required by the European Commission.

7. Nature of granting of data and consequences of the refusal to respond

Granting of data for purposes of which art. 2.A) is required. In their absence, cannot be ensured Services of art. 2.A).

The conferral of data for purposes of which art. 2.B) is instead non-mandatory. May therefore decide not to give any data or refuse successively the possibility to process data that have been already provided: in that case, newsletter, marketing communications and advertising products related to Services provided by the Controller. Rights to Services of which art. 2.A) will be still provided.

8. Rights of the data subject

As a data subject, rights of which art. 7 Privacy Code and art. 15 GDPR and precisely rights to:

- *Obtain confirmation of whether or not Personal data that concern, even if not registered yet, exists, and their communication in an intelligible form.*
- *Obtain information about: a) the origin of personal data; b) purposes and mode of Processing; c) logic involved for the Processing made with electric devices; d) Contact details of the Controller, the officers and the representative appointed pursuant to art. 5, paragraph 2 Privacy Code and art. 3, paragraph 1, GDPR; e) subject or categories of which personal data could be communicated or become aware in quality of representative designed throughout the State, of officers or agents;*
- *Obtain: a) update, correction meaning, when there is interest, data integration; b) cancellation, anonymously processing or blocking of processed data in violation of law, including those of which maintenance in relation to purposes for whom data have been collected or further processed;*

Documentary evidence that operation of which letter a) and b) have been made aware, even for their content, those who data have been communicated or diffused, except if the fulfillment reveal itself impossible or involves a use of methods clearly disproportionate to the protected right;

- *Oppose, in full or in part: a) for legitimate reasons to the Process of personal data, although appropriate to the purpose of collection; b) to the Process of personal data with the purpose of sending advertising or direct selling or market survey or marketing communication material, throughout automatic calling systems without any operator assistance throughout e-mail and/or throughout traditional marketing procedure throughout phone and/or snail mail. It is recalled that the data subject's right to object, stated in paragraph b), for direct marketing purposes through automatic procedure shall extend to the traditional ones and the subject may nevertheless exert his right to oppose, even partially. Therefore, the subject shall decide to receive communication only through traditional procedure namely automated communication or neither one of those communication types.*

Where applicable, has also rights of which art. 16-21 GDPR (*right of reply, right to be forgotten, right of data-processing restriction, right to data portability, right to object*) and the right to complaint to Guarantor Authority.

9. Procedure for the exercise of any right

It could at any times exercise rights sending:

- A registered letter to a.r. AXANA 2000 srl, at the administrative address Via Albere, 3/R — 36060 Romano d'Ezzelino (VI);
- An e-mail to info@axana.it

10. Controller, directors and agents

The Controller of the Process is AXANA 2000 srl, with head office in Via Dante Alighieri, 104 and administrative address in Via Albere, 3/R — 36060 Romano d'Ezzelino (VI). The current list of directors and agents to the Process is in the Controller head office.