

Information pursuant to and for the purposes of articles 13 and from 15 to 22 of the EU Regulation 2016/679 concerning the protection of natural persons with regard to the processing of personal data.

The Data Controller ACTION ICT S.r.l., with registered office at via Medici n.8, 20123 Milan (Italy), VAT number 03187630128, represented by the Legal Representative, informs you pursuant to and for the purposes of articles 13 and 15 to 22 of EU Regulation 2016/679 (hereinafter GDPR) which:

1. Subject of the processing

The aforementioned EU Regulation provides a series of obligations for those who process personal data referring to other subjects ("Data Subject"). The management of personal data involves the processing by us of your data, or those entrusted by you (eg relating to its employees, collaborators or other third parties), of a personal nature, including personal data and contact details (geographical addresses, e-mail, telephone numbers, fiscal data) relating to natural persons, treated by us for the stipulation and execution of the contractual relationship with the Suppliers, including those of the Supplier natural person, the legal representative of the Supplier, legal person, as well as the employees and consultants of the Supplier involved in the activities referred to in the contract.

2. Purpose of data processing

The processing of your personal data, of which we are in possession or which will be requested from you or which will be communicated by you, is and will be carried out for:

2.1 management of the pre-contractual / contractual relationship with the Supplier:

- the establishment, development and evolution of the commercial and contractual relationship agreed between the parties,
- verification and compliance of accounting and tax obligations,
- fulfillment of legal obligations,
- anti-corruption controls,
- management of disputes, including legal disputes;

2.2 management of Supplier activities and services:

- control and assessment of the performance of the activities referred to in the pre-contractual / contractual relationship agreed between the parties.

3. Legal basis for data processing

ACTION ICT will carry out the processing:

- because it is necessary for pre-contractual / contractual obligations pursuant to art. 6 par. 1 letter b GDPR (eg preparation and execution of the contract) and for legitimate interest of ACTION ICT as regards the processing of personal data of the employees and consultants of the Supplier,
- because it is necessary to fulfill the legal obligations to which it is subject pursuant to art. 6 par. 1 letter c GDPR (eg administrative and accounting obligations), that is, for the management of accounting and treasury management, as well as billing, in compliance with the requirements of current legislation, and for the execution of the obligations established by Laws, Regulations and Community and national regulations,
- based on your possible consent.

The provision of the data referred to in the previous points is mandatory and the data is indispensable for the fulfillment of the legal obligations arising from the establishment and regular conduct of the contractual relationship, in progress or in the future. Any refusal to grant them would prevent the establishment of any contractual relationship between the parties.

Your personal data will not be processed for purposes other than those described in this statement, unless you inform them in advance and, if necessary, obtain your consent.

4. Data processing methods

The processing will take place with manual and / or automated systems to store, manage and transmit the data, with logics strictly related to the same purposes, based on the data in our possession and with a commitment on your part to promptly notify us of any corrections, additions and / or updates.

5. Data communication

Your data, for legal obligations or for exclusive functional reasons in the execution of the obligations deriving from the pre-contractual / contractual relationship between the parties, will be communicated:

- to customers;
- to accounting professionals, data processing centers and / or service companies outside our organization but closely related to it for operational purposes;
- to credit and / or financial companies, insurance companies, subjects in charge of the transport service and / or delivery, to subjects in charge of correspondence;

- to tax consultants, to legal advisors, to subjects for whom the right to access the data is necessary or is in any case functional to the management of the contractual relationship with the customers;
- to the State, to private and public entities, also following inspections or verifications or for the fulfillment of obligations deriving from the Law or from mandatory Regulations, from EU or national legislation.

The list of Data Processors and Sub-Processors pursuant to art. 28 of the EU Regulation 2016/679, is available at the headquarters of the Data Controller.

The scope of any communication and / or data transfer will be national or in countries of the European community, subject to the GDPR, and it is not possible to disseminate the data to undetermined subjects without prior specific consent.

6. Data retention

The data will be processed until the conclusion of the existing contractual relationship and until the related accounting and administrative activities are completed.

Once the treatment has been completed, the data will be kept for compliance with tax conservation obligations for a maximum time of 10 (ten) years, except for different obligations.

Once the aforementioned storage terms have expired, the data will be destroyed or made anonymous, consistent with the technical procedures for deletion and backup.

7. Rights of the Data Subject

We inform you of the existence of the data subject's right to obtain from the Data Controller the confirmation that your personal data is being processed or not, to obtain access to your personal data and related information (such as the purpose of the processing, the categories of personal data in question, the recipients to whom the personal data have been or will be communicated, in particular if recipients of third countries or international organizations, the period of storage of personal data provided or the criteria for determining this period), to obtain rectification in the event of inaccuracy, cancellation, limitation of processing or opposition to such processing and the portability of the data, pursuant to articles from 15 to 22 of the EU Reg. 2016/679.

If you believe that the processing of your data violates the provisions contained in the Regulation, you have the right to complain to the competent Supervisory Authority, in accordance with the provisions of art. 77 of the GDPR.

The complete text of EU Regulation 2016/679, concerning the protection of individuals with regard to the processing of personal data and the free circulation of such data, is available at our office and also on the website www.garanteprivacy.it.

To exercise the rights mentioned above, you may contact the Data Controller by referring to the email privacy@action-ict.com or by sending a registered letter to the following address: ACTION ICT S.r.l. , Via Medici n.8 , 20123 Milan (Italy).

Milan, 20/07/2019

ACTION ICT