



Information pursuant to art. 13 of the EU regulation Nr. 679/2016 ("GDPR")

The undersigned company, SPAM S.r.L., protects the confidentiality of the personal information it acquires for business reasons, furthermore it guarantees it will provide all necessary protection from any event that might put such information at risk of violation.

Pursuant to and for the purposes provided by the EU Regulation Nr. 679/2016 ("GDPR"), and in particular its art. 13, please find below the user ("Data Subject") information concerning the processing of personal data.

The present information ("Information") is based on both the transparency principle and the elements required by the GDPR. It is divided into individual sections, each dealing with a specific topic. The aim is to make the entire document easier and quicker to read.

SECTION 1

Who we are and which data we process [Art. 13, paragraph 1, letter a); Art. 15, letter b) GDPR]

The processing of the Data Subject's personal data is performed by SPAM S.r.L., in the person of its legal representative, Andrea Grifagni, pro tempore, based in the city of Arezzo (AR), via La Chianicella 27, who, being the Data controller ("Data Controller") can be contacted at gdpr@spamsrl.com. Andrea Grifagni will collect and/or receive information concerning the Data Subject such as:

Data category	Exemplification of data types
Personal information	name, surname, address, nationality, province and city of residence, fixed and/or mobile phone, fax, fiscal code/VAT number, e-mail address/es, a copy of an identity document
Bank details	IBAN and bank/postal details (except credit card numbers)
Transmitted Internet data	Connection logs, source IP address



In accordance with art. 9 of the GDPR, the Data Subject will not be asked to provide so-called "special" data, namely personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of singling out a natural person, nor data concerning health or a natural person's sex life or sexual orientation. Should such data become necessary for the processing performed by the Data Controller (please read Section 4 below for more information on this topic), the Data Subject will receive both appropriate information and a consent request.

SECTION 2

For what purposes are the Data Subject's data needed [Art. 13, paragraph 1 of the GDPR]

The legal basis for the processing of the Data Subject's personal data is required for: • Contractual obligations and fulfillment of contract;

- legal obligations;
- legitimate interest on the part of the Data Controller to carry out processing activities aimed at protecting the company's assets and security systems;
- commercial consent and use of the Data Subject's service/products. The aim of the processing of the Data Subject's data is the provision of the services/products, and the compliance with legal obligations, such as:

	Description	Customers	Supplier	Web users
1	Carrying out preliminary activities and those arising from the conclusion of a contract, management of orders, provision of the requested service or product	X	X	X
2	Invoicing of the amounts due, handling of payments, fulfillment of all other obligations/services under the Contract	X	X	
3	Complying with regulatory requirements, including those for accounting, administrative and tax purposes.	X	X	X
4	Management of any complaints or disputes.	X	X	X
5	Reporting and quality control	X	X	X



6	Communication and/or sending (via e-mail, text messages, notifications, mail, telephone, etc.), also by automated systems, of information and material related to both the management of the contract and its performance specifications	X	X	X
7	Web management for any access to the personal area using your log in credentials, subscription to the newsletter service or request of information by completing the contact form	X	X	X



IT security

The processing of the Data Subject's Internet personal data, performed either by the Data Controller or its suppliers (third parties and/or recipients) will be limited to what is deemed necessary so as to ensure the security of the network or information, namely the ability of a network or system to withstand, according to a certain level of security, unforeseen events or either illicit or malicious acts that compromise the availability, authenticity, integrity and the confidentiality of personal data stored or transmitted.

The Data Controller shall promptly inform the Data Subjects, if there is a risk concerning the breaching of their data, without prejudice to the obligations arising from the provisions of art. 33 of the GDPR regarding notifications about personal data breaches.

The legal basis of such processing is the respect of legal obligations and the legitimate interests of the Data Controller to carry out processing activities aimed at protecting corporate heritage and the security of its systems.

Protection for underage users

Pursuant to the pertinent national legislation, the Services/Products offered by the Data Controller are reserved to persons that are legally allowed of concluding contractual obligations. Personal data concerning underage individuals will not be processed by the Data Controller without prior parental authorization.

Communications to third parties and categories of recipients [Art. 13, paragraph 1 GDPR]

The Data Subject's personal data will be processed only by authorized personnel, as well as by any persons appointed as Processors, in respect of the GDPR provisions. Personal data may be communicated to third parties whose services are necessary for the execution of the established contractual relationship, as well as to comply with certain legal obligations; specifically:

Categories of recipients	Purposes
Third suppliers *	



	Administrative, accounting and performance-related contract obligations. Provision of services and activities requested, assistance, maintenance, provision of additional services connected to the service requested
Lending institutions, digital payment institutions, banks, postal services	Management of receipts, payments, refunds related to the requested service
External professionals/consultants and consulting firms	Provision of the services and activities requested, fulfillment of legal obligations, ability to exercise rights, defense of contractual rights, debt collection
Financial administration, public authorities, judicial authorities, other authorities	Fulfillment of legal obligations, defense of rights
Subjects that are formally delegated or authorized by the law	Legal representatives, curators, tutors, etc.

* The Data Controller requires all aforementioned entities, individuals and Data Processor that perform the processing to have the same security measures as those of the Data Controller; the scope of action of the Processor is still restricted to the processing, thus to the requested services.

The Data Controller may not transfer personal data to individuals (or entities) operating in countries where the GDPR is not applied (countries outside the EU), unless specifically requested, in any case after having duly informed the Data Subject who may even be asked to provide consent.

Legal basis of such processing is the fulfillment of performances under the contractual relationship established, compliance with legal obligations and the legitimate interest on the part of the Data Controller to carry out the processing necessary for such purposes.



SECTION 3

What happens if the Data Subject does not provide data that is indicated as necessary to perform the requested service? [Art. 13, paragraph 2, letter e) GDPR]

The collection and processing of personal data is necessary to allow the provision of the requested services and/or to provide the service/product ordered. In case of failure to provide such data, the Data Controller cannot fulfill the contract nor provide the service required.

What happens if the Data Subject does not provide consent to the processing of personal data for promotional activities related to Services other than those purchased?

Should a consent to processing of personal data be requested for such purposes, failure to provide such consent will prevent the processing without effects on the provision of the services required, nor on those for which the Data Subject has already given its consent, if required.

In cases where the Data Subject has initially given consent and subsequently decides to withdraw or oppose to the processing for promotional activities, the data will no longer be processed for such purposes, furthermore, this will not have any effect on the Data Subject, nor on any services provided.

How the Data Subject's data is processed [Art. 32 GDPR]

The Data Controller has appropriate security measures in place aimed at preserving the Data Subject's personal data confidentiality, integrity and availability, furthermore, it obliges its suppliers and Processors to adopt the same security measures.

Where does the processing of the Data Subject's data take place?

The Data Subject's personal data are stored in paper, computer and data files, which are in the IT systems within the main plant located in Arezzo(AR), Strada A, 32 - Loc. San Zeno. Cloud infrastructure providers that are associated with the Cloud Security Alliance (CSA) may be used for full and/or partial preservation of data in electronic format [<https://cloudsecurityalliance.org/>], in compliance with the obligations of the GDPR.

How long is the Data Subject's data kept for? [Art. 13, paragraph 2, letter a) GDPR]

The Data Subject's personal data will be kept for a period deemed necessary to fully perform the aforementioned purposes. In particular, the Data Subject's personal data will be processed for a period of time equal to the minimum required, namely, until the cessation of the contractual relationship with the Data Controller.



If the Data Subject decides to grant its consent (non-compulsory) to marketing and/or profiling activities, the Data Subject's personal data will be retained, unless in case of withdrawal of consent, for a period of time equal to what is necessary to achieve the purposes. If the Data Subject forwards to the Data Controller personal data that is not required or necessary to the execution of the service and/or the contract, thus for the provision of the service requested, the Data Controller cannot be considered the new owner of such data, and therefore, it (the Data Controller) will cancel it as soon as possible.

Regardless of the Data Subject's decisions, personal data will be stored under the terms of the current legislation and/or national regulations, for the sole purpose of ensuring the fulfilling of specific requirements that are part of certain contracts and/or services. Similarly, personal data will in any case be kept for the fulfillment of obligations (eg. tax and accounting) that persist even after the termination of the contract (Art. 2220 - Conservation of accounting records); the Data Controller will only retain personal data that is strictly necessary for this purpose.

The exception to such scenario is a situation in which the rights deriving from the contract are to be enforced in court, in which case, the Data Subject's data (only those necessary for such purposes) will be processed for this purpose and for the length of the court proceedings.

What are the rights of the Data Subject? [Articles 15 – 20 of the GDPR]

The Data Subject has the right to obtain from the Data Controller the following:

- A. Confirmation as to whether its personal data is being processed, and, should it be the case, get access to the said personal data, as well as to the following information:
 - the purposes of the processing;
 - the categories of personal data concerned;
 - the recipients or categories of recipients to whom the personal data has been or will be disclosed to, in particular if such recipients are in other countries or are part of international organizations;
 - where possible, the period for which the personal data is expected to be stored, if not possible, the criteria used to determine such period;
 - the existence of the right to request from the Data Controller rectification or erasure of personal data, or restriction to the processing of personal data concerning the Data Subject, or to object to their processing;
 - the right to lodge a complaint with a supervisory authority;
 - the existence of an automated decision-making procedure, including profiling, and, at least in such cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the Data Subject;
- B. the right to receive a copy of the personal data being processed, as long as this does not damage the rights and freedoms of others; should the Data Subject ask for further copies, the Data



Controller may charge a reasonable fee contribution that will be based on the administrative costs incurred.

- C. the right to obtain from the Data Controller rectification of any of its personal data if inaccurate, without undue delay.
- D. the right to obtain from the Data Controller the erasure of its personal data without undue delay, if the grounds provided by GDPR art. 17 exist. This includes, for example, a scenario where the personal data are no longer required for the processing or if such processing is presumed to be illegal, provided the conditions laid down by the law exist, and in any case, if the processing is not justified by another reason that is equally legitimate;
- E. the right to obtain from the Data Controller a limitation of the processing, in the cases provided by art. 18 of the GDPR. For example, when the Data Subject has disputed the accuracy of its personal data, for a period of time that is deemed necessary to allow the Data Controller to verify the accuracy thereof. The Data Subject must be informed, in a reasonable amount of time, about the expiration of the suspension period or about the cause that determines the cessation of the limitation of processing and, therefore, about the revoking of the limitation itself;
- F. the right to obtain communication from the Data Controller about any recipients to whom requests for any adjustments, cancellations, limitations of the processing have been sent to, except in those cases where this proves impossible or it involves a disproportionate effort;
- G. the right to receive in a structured format, that being in commonly used and read by an automatic device, its personal data and the right to transmit such data to another Data Controller. Such forwarding must not be impeded by the Data Controller, in the cases provided by art. 20 of the GDPR, and, if technically feasible, the right to have the its personal data transmitted from one data controller to another.

For any further information and to send a request, please contact the Data Controller at gdpr@spamsrl.com . To ensure that the above rights are exercised by the Data Subject and not by unauthorized third parties, the Data Controller may ask to provide additional information.

How and when the Data Subject can oppose the processing of its personal data? Art. 21 of the GDPR] For reasons relating to a specific situation concerning the Data Subject, the latter, at any time, may object the processing of its personal data if this is based on a legitimate interest or if such data is used for commercial/promotional reasons, by sending a request to the Data Controller at gdpr@Spamsrl.com.

The Data Subject has the right to have its own personal data canceled if there is no legitimate prevailing reason from the Data Controller than the one that originated the request, or, in any case, if the Data Subject does not accept the processing for commercial reasons.



Who may the Data Subject lodge a complaint with? [Art. 77 of the GDPR]

Without prejudice to any other action in administrative or judicial proceedings, the Data Subject can lodge a complaint with the competent Italian supervisory authority (Autorità Garante per la protezione dei dati personali), or with its equivalent, carrying out the same duties and exercising the same powers, in the EU state where the violation to the GDPR occurred.

Any update to this policy will be communicated promptly and with appropriate means. Furthermore, the Data Controller shall notify in advance the Data Subject if the processing includes purposes other than those referred to in this Information. Where necessary, the Data Controller may not go ahead with such additional processing without prior consent from the Data Subject.

SECTION 4

General information, deactivating and managing cookies

Cookies are data sent from the website and stored by the user's Internet browser, computer or other device (e.g., tablet or mobile phone). Technical cookies and third party cookies may be installed from our website or its subdomains.

At any time, the user can manage or disable storage or deletion of cookies by changing the settings on his/her own Internet browser. However, this can slow or prevent access to certain areas of the website. The settings for managing or disabling cookies may vary depending on the Internet browser used. For more information on how to carry out such operations, please consult the manual of your device or the "Help" function of your Internet browser.

The Undersigned (name and surname or company name) _____

Resident in (Address, Postcode, City) _____

Fiscal Code / VAT Nr. _____

Nr. and Doc. Type. Identity _____



DECLARES

to have read the Privacy policy and therefore

AUTHORISES

SPAM Srl to the processing of personal data

_____, _____
Place, Date

Signature of the Declarant
