

Information in accordance with Art. 13 of EU Regulation 679/2016

Dear customer,

we inform you that the Legislative Decree 196/2003 "Data protection Law" and subsequent amendments and the EU Regulation 679/2016 provide for the protection of persons and other subjects in the processing of their personal data.

NUVAP S.p.A (Vat number 02137180507), with head office in Milano, via del Vecchio Politecnico, 7 - 20121 Milano (hereinafter referred to as "Data controller"), as data controller, inform you that, pursuant art. 13 of EU Regulation 679/2016 (hereinafter referred to as "GDPR", data will be processed in the manner and for the following purposes:

1.Object of Data Processing

The Data Controller processes personal data, identifying oneself (for example, name, surname, company name, address, telephone number, e-mail address, bank and payment details) - hereinafter, "personal data" or "data", communicated at the conclusion of contracts.

2.Purpose of data processing

Your personal data are processed:

- A) without your express consent (Article 6 letter b), c), d) e), f) for the following Service Purposes:
- Processing is necessary for the performance of a contract or in pre-contract negotiations;
 - Processing is necessary to fulfill a legal obligation to which the data controller is subject;
 - Processing is necessary for the protection of vital interests of the data subject or other person.
 - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority.
 - Processing is necessary for the purposes of the legitimate interests pursued by the data controller and third parties, provided that the interests or fundamental rights and freedoms of the data subject are not overriding, in particular if the data subject is a minor.
- B) Only with your prior specific and distinct consent pursuant to art. EU Regulation 679/16, for the following Marketing Purposes:
- Send you by e-mail, post and / or sms and / or telephone newsletters, commercial communications and / or advertising material on products or services offered by the Data Controller and customers satisfaction surveys;
 - Send you by e-mail, post and / or sms and / or telephone commercial and / or promotional communications from third parties (for example, business partners, insurance companies, etc.).

We inform you that if you are already our customers, we will be able to send you commercial communications regarding services and products similar to those you have already used, unless expressed dissent.

3.Processing methods

The processing of your personal data will be carried out through the operations listed in art. n. 2) GDPR and precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.

Your personal data are processed in both paper and electronic and / or automated form.

The Data Controller will process your personal data for the time necessary to fulfill the aforementioned purposes and in any case for no more than 10 years from the termination of the relationship for service purposes and for no more than 3 years from the collection of data for marketing purposes.

4. Access to data

Your data may be made accessible for the purposes referred to in art. 2.A) and 2.B):

- To employees and collaborators of the Data Controller or companies of NUVAP S.p.A, in their capacity of authorized or designated subjects for the processing of personal data and / or system administrators;
- To third parties companies or other subjects (such as banks, professional firms, consultants, insurance companies, etc.) who carry out outsourcing activities on behalf of the Data Controller, in their capacity of external data processors.

5. Data communication

Without any obligation of a prior consent art. 6 lett. b) and c) GDPR), the Data Controller may communicate your data for the purposes referred to in art. 2.A).

Without prejudice to communication or diffusion for legal reasons, your personal data may be communicated in Italy and / or abroad to:

- Professionals and consultants, consulting companies, factoring companies, banks, credit recovery agencies, credit insurance companies, commercial information companies, transport companies;
- Public and private agencies, also following inspections or audits, such as: Financial Administration, Tax Police, Judicial Authorities, Italian Exchange Office, Employment Agency Inspectorate, Local Health Authority, Social Security Administrations, Chamber of Commerce, etc.;

Your data will not be disclosed.

6. Data transfer

In any case, it is understood that the Data Controller, if necessary, will have the right to move the servers even outside the EU.

In this case, the Data Controller ensures from now that the transfer of data outside the EU will take place in accordance with applicable laws, subject to the stipulation of the standard contractual clauses provided by the European Commission.

The Controller Data reserves the right to use cloud services and in this case the service providers will be selected from those who provide adequate guarantees, as required by art. 46 GDPR 679/16.

7. Nature of data provision and consequences of a refusal to answer

The provision of data for the purposes referred to in art. 2.A) is mandatory. In its absence, we will not be able to guarantee the services referred to in art. 2.A).

Instead the provision of data for the purposes referred to in art. 2.B) is optional. You can therefore decide not to provide any data or subsequently to deny the possibility of processing data already provided: in this case, you will not be able to receive newsletters, commercial information and advertising material relating to the Services offered by the Data Controller. However, you will continue to be entitled to use the Services referred to in art. 2.A)

8.Data subject rights

As a data subject, you have the rights referred to in art. 15 GDPR and precisely the rights to:

- Obtain the confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
- Obtain the indication of:
 - a. the origin of the personal data;
 - b. the purposes and processing methods;
 - c. the method applied in case of processing carried out with the aid of electronic instruments;
 - d. the information identifying the Controller Data, the designated subject, the Data Protection Manager if appointed, the subjects or categories of subjects to whom the personal data might be communicated or who could have access as appointed representative in the territory of the State, managers or appointees.
- Obtain:
 - e. the updating, the rectification or the integration of data;
 - f. the cancellation, transformation into anonymous form or the blockage of data processed in breach of the law, as well as those that need not to be stored for the purposes for which the data were collected or subsequently processed;
 - g. the attestation that the operations referred to in letters e) and f) have been brought to the attention, even with regards to their content, of those to whom the data have been communicated or shared, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that it has been protected
- Object in whole or in part:
 - h. due to legitimate reasons to the processing of personal data concerning you, even if pertinent to the purpose of the collection;
 - i. to the processing of personal data concerning you for the purpose of sending advertising material or direct sale or carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and / or traditional marketing methods like telephone and / or paper mail.

It should be noted that the right to object, for direct marketing purposes through automated methods, is extended to traditional ones and in any case it remains the possibility for the data subject to exercise the right to object, even partially. Therefore, the subject can decide to receive only traditional communications or only automated communications or none of the two. Where applicable, he also has the rights referred to in Articles 16-21 GDPR (Right of rectification, right to be forgotten, right to limitation of processing, right to data portability, right of opposition), as well as the right to complain to the Data Protection Authority.

9.Exercise of the rights

You can exercise your rights at any time by sending:

- a registered letter to NUVAP S.p.A (Vat number 02137180507) Italy, 56021 – Cascina (PI), Via Giuntini 25
- a Certified E-Mail to nuvap@legalmail.it

[10.Controller Data, managers for personal data processing](#)

The Controller Data is NUVAP S.p.A (Vat number 02137180507), registered office in Italy, Milan, Via del Vecchio Politecnico, 7.

The updated list of data processors managers is available to the registered office of the Data Controller.