

#### INTRODUCTION

With EU Regulation 679/2016, laying down provisions for the protection of individuals with regard to the processing of personal data, LAMFER SRL with headquarters in via A. Magni 2/A 20865 Usmate Velate (MB) (hereinafter referred to as "organization") as Data Controller, is required to provide some information regarding the use of personal data. The Internal data processor appointed by the data controller is Accountant Giorgio Bonalume.

#### SOURCE OF DATA AND TYPE OF DATA PROCESSED



Personal data acquired by the organization may be collected:

- Directly from the data subject
- From open access sources (e.g., documents published at the Chamber of Commerce, etc.)
- at third parties in the event that the organization acquires data to offer products and/or services

For data collected not directly from the interested party, this policy is provided at the time of registration and in any case no later than the first communication. If the existing relationship requires it, the data processed are: Personal data.

In any case, all these data are processed in compliance with the aforementioned regulation and the confidentiality obligations that have always inspired the activities of the organization.

#### DATA RETENTION PERIOD



The data are kept only for the period necessary for the purposes for which they are processed or within the terms provided by laws, rules and national and EU regulations to which the organization must adhere (eg. accounting and tax regulations, etc.). A periodic annual check will be carried out on the data processed and on the possibility of deleting them if they are no longer necessary for the intended purposes.

#### PROVISION OF DATA AND CONSEQUENCES OF FAILURE TO PROVIDE THEM



The provision of data must be considered mandatory with regard to the processing that the organization must carry out to fulfill its obligations towards the person concerned on the basis of the relationship (or contract) in place, as well as legal obligations, rules, regulations. Failure to provide such data may make it impossible for the organization to proceed with the existing relationship.



Consent is not mandatory for all other purposes and, if given, may be revoked at any time by the person concerned.

#### MANDATORY/NOT MANDATORY

The purposes for which the provision of data is mandatory are marked with the following symbol:




The purposes for which the provision of data is NOT mandatory are marked with the following symbol:



#### PURPOSE OF DATA PROCESSING



The data are processed within the normal activity of the organization and according to the following purposes. If the data controller intends to further process the personal data for a purpose other than the one for which they were collected, it will provide the data subject with all the necessary information in advance and will request his/her consent if needed.

-  Purchase of services and/or products in the context of the existing relationship (or contract), including administrative, accounting and tax requirements, management of obligations provided for by national and EU laws, regulations and legislation, as well as provisions issued by authorities empowered to do so by law and by supervisory and control bodies.

#### LEGAL BASIS OF DATA PROCESSING



The data are processed for the above purposes, also in order to comply with a contractual/pre-contractual, legal, regulatory obligation, as well as instructions given by authorities empowered to do so and by supervisory and control bodies. The explicit legal references updated to their latest state of revision that set out the obligations or requirements on the basis of which the processing of data (including sensitive data) may be carried out are available for consultation at the Data Controller and, in any case, are part of current EU law as well as of the Member State to which the data controller is subject.

#### METHODS OF DATA PROCESSING



The processing of personal data is carried out using manual, computer and electronic tools with logics strictly related to the purposes and in any case so as to ensure the safety and confidentiality of the data. The documents are filed both electronically and in paper form. Below is some essential information.



The collection of personal data is limited to the minimum necessary for each specific purpose of the processing



The processing of personal data shall be limited to the purposes for which they were collected



The storage of personal data is limited to the minimum necessary for each specific purpose of the processing



We do not provide personal data to commercial third parties



The sale or rental of personal data are not carried out

#### SCOPE OF DISSEMINATION AND CATEGORIES OF SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED



The personal data collected by the organization may be communicated, within the limits strictly relevant to the purposes mentioned above, also to the following subjects or categories of subjects. For all the purposes mentioned above, the communication of data also derives from a legal or contractual obligation or is a necessary requirement for the conclusion of a contract. In the absence of the above communications, the relationship/contract may not be completely fulfilled.

The data may also be communicated to the persons mentioned below for the purpose of supplying products requested by the interested party also in non-EU third countries (Turkey, USA, or any other country of the customer). In such cases, the transfer of data abroad is necessary for the performance of a contract between the data subject and the data controller or for the performance of pre-contractual measures taken at the request of the data subject, as well as for the conclusion or execution of a contract concluded between the data controller and another natural or legal person for the data subject.

**SCOPE OF DISSEMINATION AND CATEGORIES OF SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED**

- ✓ Persons to whom the communication is required by law, regulation or national and EC legislation, for the fulfilment of contractual or pre-contractual obligations (Credit institutions, Insurance Companies and similar bodies).
- ✓ Customers for activities related to the existing relationship with the organization
- ✓ Consultants for the purpose of the study and resolution of any legal issues relating to the contractual position in place and external firms specializing in the management of accounting and tax issues (eg. accountant, etc..)
- ✓ Consultants and professionals (technicians, designers, etc..) or companies that collaborate with the organization in order to provide the requested service or sell the product purchased (eg. carriers, group companies, etc..)
- ✓ Companies of the group or affiliates for purposes related to the relationships with the organization
- ✓ Companies that survey the quality of the services provided, companies that carry out activities of transfer, enveloping, transport and sorting of communications.

**RIGHTS OF THE DATA SUBJECT**



At any time, the data subject may exercise his/her rights with respect to the Data Controller or Data Processor, pursuant to EU Regulation 679/2016 by contacting LAMFER srl and the Data Processor Accountant Giorgio Bonalume to the following contact details: lamfer@lamfer.com - Tel. +39 039 688.9030 - Fax +39 039 607.6852 - LAMFER SRL - Via A. Magni 2/A 20865 Usmate Velate (MB) (for written communication). In order to guarantee the correct exercise of the rights, the data subject must be unequivocally identifiable. The organization undertakes to provide feedback within 30 days and, if unable to meet these deadlines, to justify any extension of the time limits. The feedback will be free of charge except in cases of groundlessness (e.g. there are no data regarding the applicant) or excessive requests (e.g. repetitive over time) for which a contribution can be charged not exceeding the costs actually incurred for the research carried out in the specific case. The rights relating to personal data concerning deceased persons may be exercised by those who have an interest of their own or act to protect the person concerned or for family reasons worthy of protection. The data subject may also lodge a complaint with the supervisory authority.

In case of violation of personal data suffered by the organization, the data controller will notify the violation to the competent authority within 72 hours of the event and will also communicate the event to the data subject, except for cases of exclusion under the law.

THE DATA SUBJECT HAS THE RIGHT TO REQUEST: Access, correction, cancellation of personal data, limitation of processing and portability of data.  
THE DATA SUBJECT HAS THE RIGHT TO OPPOSE: the processing and revoke his/her consent at any time without prejudice to the lawfulness of the processing based on the consent expressed before the revocation.

**THE RIGHT TO BE INFORMED OF**

- Origin of personal data
- Categories of processed data
- Purposes and methods of processing
- Retention time
- logic applied in case of processing carried out with the aid of electronic tools
- identification data of the Data Controller and the Data Processor
- subjects and categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as managers or persons in charge, also in Third Countries.
- existence of the profiling process

**THE RIGHT TO BE OBTAIN**

- confirmation of the existence of their personal data and that such data are made available in an intelligible form
- updating, correction, addition and limitation of data
- cancellation (right to be forgotten), transformation into anonymous form or blocking of data processed in violation of the law (including data that need not be kept for the purposes for which they were collected or subsequently processed)
- certification that the operations referred to in the above paragraphs have also been notified to those to whom the data were communicated or disseminated, except where this requirement proves impossible or involves a manifestly disproportionate use of means compared to the right protected by the organization
- data portability (direct transmission from one data controller to another)
- copy of processed data

**THE RIGHT TO OPPOSE**

- the processing of personal data concerning the data subject, including profiling for legitimate reasons, even though they are relevant to the purpose of collection
- the processing of personal data concerning the data subject for the purposes of: sending advertising materials, direct selling, carrying out market research, commercial communications
- the processing of data processed for purposes of scientific or historical research or for statistical purposes, except in cases of public interest in the processing



**POLICY AND REQUEST FOR CONSENT TO THE PROCESSING OF PERSONAL DATA  
FOR SUPPLIERS AND/OR COLLABORATORS**


Rev. 2018

LAMFER SRL – VIA A. MAGNI 2/A 20865 USMATE VELATE (MB)

COMPANY NAME/  
NAME AND SURNAME .....

ADDRESS .....

Provided that, as defined in the notice that the undersigned expressly declares to have received and read, the execution of the relationship/contract in place with LAMFER SRL may entail the need to process data (including data of individuals linked to the supplier organization) and aware that, in the absence of the provision of such data (and in the absence of related communications) the relationship/contract may not be fully exercised, the supplier organization / the undersigned freely expresses consent in the manner described below.

PURPOSES FOR WHICH CONSENT IS REQUIRED	I GIVE MY CONSENT	I DENY MY CONSENT
 Purchase of services and/or products in the context of the existing relationship (or contract), including administrative, accounting and tax requirements, management of obligations provided for by national and EU laws, regulations and legislation, as well as provisions issued by authorities empowered to do so by law and by supervisory and control bodies.	<input type="checkbox"/>	<input type="checkbox"/>

SIGNATURE .....

DATE .....