

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 third parties (for example, in cases of salary-backed loan, communications relating to family allowances, registration with professional associations, etc.)

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 and special data such as sensitive data.

The provisions of Law 300/70 and subsequent amendments, as well as the provisions of art. 6 of Law 135/90 remain unaffected.

It may happen that, in the fulfilment of specific obligations relating to the management of the employment relationship (e.g. accounting, remuneration, social security, welfare and tax), the organization acquires "sensitive" data which could possibly disclose racial and ethnic origin, religious beliefs, political opinions, membership of parties, trade unions, associations or organisations of a religious, philosophical, political or trade union nature, as well as the health condition (health and accident certificates, pregnancy certificates, union proxies, membership of protected categories, participation in workers' representative bodies, results of medical examinations carried out in accordance with the law and the contract, exercise of public offices, etc.).

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

MANDATORY/NOT MANDATORY



The provision of data must be considered mandatory with regard to the processing that the organization must carry out to fulfil 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.

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



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

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.

Purposes closely related and instrumental to the management of the employment relationship in any form (eg internship, temporary employment, permanent employment, etc.) and the management / organization of activities typical of the organization (eg. forwarding organizational communications related to the activity, organization of management systems, provision of training services to personnel deemed necessary by the organization in order to carry out its activities in a competent manner, etc), including the related legitimate interests obligations, i.e. the administrative, accounting and tax fulfillment of obligations provided for by laws, regulations and EU legislation, as well as provisions issued by authorities empowered to do so by law and by supervisory and control bodies (e.g. accounting, remuneration, social security, welfare, tax, etc.).



Possible transfer/communication of company contact data abroad to affiliated organisations, customers, suppliers (in EU countries/non-EU countries) for purposes related to the management of the relationship/contract in place with the person concerned, with the customer or with the supplier.

Mention of the name and use of photos explicitly portraying the person concerned by way of reference, through communications made via the Internet, mailings, web and social media or traditional media, brochures, catalogues and offering documents to new prospect customers or existing customers.

LEGAL BASIS OF DATA PROCESSING



The data are processed for the above purposes, not only on the basis of consent, but 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

METHODS OF DATA PROCESSING



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.

Persons to whom communication is required by law, regulation or national and Community legislation, for the fulfilment of contractual or pre-contractual obligations: For example, customers/suppliers in the field of contract management and in compliance with the stipulated contractual conditions or commercial agreements, public administrations, credit institutions, insurance companies, pension plans and similar bodies, external companies for the management of the payroll and contribution service and personnel management consultancy, auditing companies, companies that provide data processing services and consequent and complementary services, legal consultants for the resolution of any legal problems in the field of work, credit institutions for the payment of salaries.

- ✓ Companies that carry out activities of transfer, enveloping, transport and sorting of communications to the interested parties.
- ✓ Consultants and professionals or companies that collaborate with the organization in order to provide the requested service, sell products (e.g. carriers, Group and/or associated companies, etc..) or support the company in the communication activities
- ✓ Companies of the group or affiliates for purposes related to the relationships with the organization

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 THE PERSONNEL**





Rev. 2018

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

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 existing relationship / contract with LAMFER SRL may involve the need to process data (including sensitive data) and aware that, in the absence of the provision of such data (and related communications) the relationship/contract may not be fully exercised, the undersigned freely expresses consent in the manner specified below.

PURPOSES FOR WHICH CONSENT IS REQUIRED	I GIVE MY CONSENT	I DENY MY CONSENT
 Purposes closely related and instrumental to the management of the employment relationship in any form (eg internship, temporary employment, permanent employment, etc..) and the management / organization of activities typical of the organization (eg. forwarding organizational communications related to the activity, organization of management systems, provision of training services to personnel deemed necessary by the organization in order to carry out its activities in a competent manner, etc), including the related legitimate interests obligations, i.e. the administrative, accounting and tax fulfillment of obligations provided for by laws, regulations and EU legislation, as well as provisions issued by authorities empowered to do so by law and by supervisory and control bodies (e.g. accounting, remuneration, social security, welfare, tax, etc..), which may also involve the communication of data (including sensitive data) to the persons specified in the notice.	<input type="checkbox"/>	<input type="checkbox"/>
 In particular, within the scope of the purpose described above, for the processing of sensitive personal data, the undersigned	<input type="checkbox"/>	<input type="checkbox"/>
 Possible transfer/communication of company contact data abroad to affiliated organisations, customers, suppliers (in EU countries/non-EU countries) for purposes related to the management of the relationship/contract in place with the person concerned, with the customer or with the supplier.	<input type="checkbox"/>	<input type="checkbox"/>
 Mention of the name and use of photos explicitly portraying the person concerned by way of reference, through communications made via the Internet, mailings, web and social media or traditional media, brochures, catalogues and offering documents to new prospect customers or existing customers.	<input type="checkbox"/>	<input type="checkbox"/>

In the case of a minor, the consent must be given by the person having parental responsibility.

SIGNATURE

DATE