



# Elektrozubehör

Cable management from E to Z

## **PRIVACY POLICY** **PURSUANT TO ART. 13 OF EUROPEAN REGULATION 679/2016 (GDPR)**

Elektrozubehör S.p.A (P.I. 00729140152) in the person of the legal representative Beniamino Wolkowicz, with headquarter in Milan, as the proprietor, is writing to inform you that, in accordance with the European Regulation 679/2016 (so-called GDPR) which regulates the protection of personal data and their free movement, your personal data will be handled in accordance with the above mentioned regulation, based on the principles of fairness, lawfulness, proportionality of interests and transparency, as well as the protection of your privacy and rights, for the purpose, mode and terms described below.

### **1) Purpose, mode and legal basis for data processing**

Your personal data will be processed only for the purposes strictly connected, instrumental and necessary for the fulfilment of the obligations related to the relations with our Company, in particular:

- The processing of the personal data is achieved by means of the operations written in art. 4, n.2) GDPR and precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, usage, interconnection, block, communication, cancellation and erase.
- The processing of the personal data will be carried out using paper-based supports and /or data medium by the proprietor, by the person(s) in charge and by the authorized parties (entrusted) with the compliance of every precautionary measures which guarantees the safety and privacy.
- The data will not be subject to profiling, nor to automated decision-making processes.
- The explicit acceptance of this disclosure by written subscription, online subscription (opt-in), fulfilment of its contractual obligations and other requirements imposed by art.6 of European Regulation 679/2016 constitutes the legal basis for the processing of personal data.

### **2) Data collection characteristics and consequences for a possible non-conferral of the data**

The consensus on your personal data is mandatory in order to fulfil the contract, that is to say for the required performance and to comply with the obligations associated, including the legal requirements.

The non-conferral of consent could lead to the impossibility on our behalf to comply with the contractual obligations, namely to the required service.

The consensus of the usage of your data for marketing and/or advertising purposes (sending e-mails and/or communications with advertisement offers) is optional.

### **3) Timing and deadlines**

The proprietor, the person(s) in charge and those authorized (entrusted) by them will process personal data for as long as necessary and to fulfill the above mentioned purposes and, however, for no more than 10 years from the termination of the contract where required or necessary by current legislation.

### **4) Data communication and distribution**

Your personal data, used for the implementation of the contract and the above mentioned purposes, can be disclosed:

- to all natural and legal persons (as an example but not limited to consultancy law, management, fiscal and audit firms, couriers and shippers, data-processing centers, suppliers), when it is deemed necessary for the above mentioned purposes.
- to banking institutions for the management of cash receipts and payments.
- to factoring corporations or collection agencies.
- to our staff and employees specifically authorized and within the framework of their tasks.

The DPO, whenever appointed by the proprietor on voluntary or compulsory basis, as well as the name and the number of person(s) in charge can be subject to change, therefore we recommend to visit our website, where you can find all the updated information ([www.elektrozubehor.it](http://www.elektrozubehor.it)) or through the following contact details: +39 0270147212, [privacy@elektrozubehor.it](mailto:privacy@elektrozubehor.it).

#### **ELEKTROZUBEHÖR SPA**

Sede:  
Via F.lli Bronzetti, 24  
20129 Milano MI (Italy)

Centro logistico:  
Via Cadorna, 66/A  
20090 Vimodrone MI

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✉ [info@elektrozubehor.it](mailto:info@elektrozubehor.it)  
✉ [ez@pec.elektrozubehor.it](mailto:ez@pec.elektrozubehor.it)  
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## 5) Right of withdrawal

By calling the number +39 0270147212 or writing to [privacy@elektrozubehor.it](mailto:privacy@elektrozubehor.it) you can exercise your rights towards the controller at any time in accordance to European Regulation n° 679/2016, written below for your convenience.

The interested party has the right to know whether there is a processing of his personal data underway, even if not already registered, as well as its communication through various means.

The interested party has the right to know:

- the origin of personal data (particularly when the data are not collected by the interested party and, when transferring data to a third country, about the existence of adequate guarantees pursuant to art. 46 of the Regulation).
- the mode and purpose of the treatment.
- the logic applied when data-processing is done through electronic means.
- the contact details of the proprietor, the person(s) in charge and the appointed representative.
- the subjects of categories of subjects to whom personal data can be notified or that can be acknowledged, as designated territorial representative of the State, persons in charge or authorized subjects.
- the categories of personal data you are processing.
- the period of data storage or the criteria used to determine this period.
- the existence of automated decision- making processes, in particular with regard to profiling and the underlying logic.
- the right of acquiring a copy of the personal data processed.

Furthermore, the interested party has the right to obtain:

- the update, the correction, that is to say, when requested, the integration of the data.
- the cancellation, the conversion in anonymous form or the block of the data that are in violation of the law, including those whose storage is not necessary, in relation to the purposes for which they have been collected or subsequently processed.
- the attestation that the operations described in a) and b) have been notified, including with regard to their content, to those whom have received the data, except for when this fulfilment is impossible or requires disproportionate means compared to the right protected.
- data portability towards other parties for whom there must be an explicit written request (call +39 0270147212 or write to [privacy@elektrozubehor.it](mailto:privacy@elektrozubehor.it)).
- data cancellation from our archives according to art. 17 pt. 1 from point a) to f) of the Regulation (e.g. right to be forgotten), by contacting +39 0270147212 or [privacy@elektrozubehor.it](mailto:privacy@elektrozubehor.it).
- to restrict the data processing according to art.18, paragraph 1, from point a) to d) of the Regulation.

The interested party has the right to oppose, in whole or in part, to the processing of the data:

- for legitimate reasons connected to his/her particular situation, although the processing is relevant to the purpose of data collection.
- to the processing of personal data related to sending advertising material or direct sale or market researches or business communication.
- to the processing of data according to art. 6, paragraph 1, point e) to f) including profiling on the basis of those provisions.

Whenever data processing is based on the consent of the subject, he has the right to withdraw that consent at any time by making a simple request to +39 0270147212 or [privacy@elektrozubehor.it](mailto:privacy@elektrozubehor.it).

The interested party, moreover, has the right to lodge a complaint with the supervisory authority.

The application of the above mentioned rights can be exercised by a request addressed by telephone or e-mail to the above mentioned addresses or by registered letter or certified mail.

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## Consent of the subject

Asking your direct consent to the processing (which we will consider being conferred orally should this written document not being returned) we will consider you, from now, informed on the processing done by us, pursuant and for the effects of the European Regulation 679/2016.

The undersigned, acquired the information given by the controller pursuant to European Regulation 679/2016:

gives his/her consent to the processing of personal data for the purposes referred in this disclosure

☐ – Give consent      ☐ – Do not give consent

gives his/her consent for the communication of personal data for the purposes and to the third parties written in the disclosure at point 4

☐ – Give consent      ☐ – Do not give consent

gives his/her consent for the possible spread, even for advertising, of personal data for the purposes and for the scope indicated in the disclosure

☐ – Give consent      ☐ – Do not give consent

Place and date			
Company			
Surname		Name	
Stamp and signature			

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