

POLICY

Art. 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016

Under Article 13 of the General Data Protection Regulation – Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “**GDPR**”), it is our responsibility to provide you with certain information about the processing of personal data supplied in connection with your relationship with RPS S.p.A..

Data Controller
The Data Controller is RPS S.p.A., headquartered at Legnago (Verona), Viale Europa no. 7, tax code and Verona Companies Register number: 02647040233 (the “ Data Controller ” or “ Company ”).
Data Protection Officer (“DPO”)
The DPO's contact data can be found on the Data Controller's website at www.riello-ups.it or from its head office. In order to exercise your rights and for any communications, problems and/or requests for clarification about the protection of your personal data, you are free to contact the DPO.

Purposes for which processing does not require your consent

Purpose	Legal basis for the processing
Managing pre-contractual measures, and the fulfilment and execution of reciprocal contractual obligations.	(Art. 6(1) b), GDPR) Fulfilment of a contract
Administrative, accounting and fiscal obligations; credit protection.	(Art. 6(1) b), GDPR) Fulfilment of a contract (Art. 6(1) c), GDPR) Processing necessary to fulfil a legal obligation of the Data Controller (Art. 6(1) f), GDPR) Processing necessary to pursue a legitimate interest of the Data Controller in relation to the organisation, administration and financial and accounting management of its business.
Managing the archiving and conservation of data, information and communications, including electronic communications, and documents pertaining to the relationship with the Company.	(Art. 6(1) c), GDPR) Processing necessary to fulfil a legal obligation of the Data Controller

Your personal data may be disclosed to employees and/or collaborators of the Data Controller who have been duly appointed as authorised data processors, and disclosed to other persons or categories of person other than the Data Controller, such as:

Third parties or categories	Purpose	Notes
Information technology providers	Management, maintenance, updating of systems and software used by the Data Controller and video surveillance systems	Appointment as data processor (Art. 28 GDPR) Information from the DPO
Network providers, providers of online communications services, IT and online archiving services, computerised data storage and management	Hosting, housing, Cloud, SaaS and other remote information technology services that are essential to the business of the Data Controller; regulatory archiving and conservation of online documents	Appointment as data processor (Art. 28 GDPR) Cloud services may entail the processing of data in non-EU countries that can guarantee adequate privacy rights. Information from the DPO
Consultants, professionals, law firms, arbitrators, insurance companies, valuers, brokers	Judicial, extrajudicial and insurance activity in relation to claims Organisational, administrative, financial and accounting management	Appointment as data processor (Art. 28 GDPR) Information from the DPO
Banks or credit institutions, companies or bodies of any kind that exercise banking, credit, leasing, factoring or financial activities – including intermediation – and relevant, complementary or similar activities	Organisational, administrative and financial management	
Law enforcement and judicial authorities	The management of investigations by the authorities in the event of claims	

Period of conservation of the data.

Personal data and documents	Conservation period or criteria used to determine it
General details and documents pertaining to the relationship with the Company	For the period necessary to pursue the purposes of the processing and also subsequently, where permitted by law, for administrative, accounting and fiscal purposes, or to protect or enforce the rights of the Data Controller, as necessary

Please also note that you have various rights pertaining to the processing of data, which you may request from the Data Controller.

Right	Description	Mode of exercising the right
Right of access to data (Art. 15)	<p>You may request a) the purposes of the processing; b) the categories of personal data concerned; c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; f) the right to lodge a complaint with a supervisory authority; g) where the personal data are not collected from the data subject, any available information as to their source; h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4), and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.</p> <p>You have the right to request a copy of the personal data that have been processed.</p>	Forms on website
Right of rectification (Art. 16)	You have the right to obtain the rectification of inaccurate personal data concerning you, and to have incomplete personal data completed.	Forms on website
Right to be forgotten (Art. 17)	You have the right to obtain from the Data Controller the erasure of your personal data if that data is no longer necessary for the purpose for which it was collected or otherwise processed.	Forms on website
Right to restriction of processing (Art. 18)	You have the right to obtain from the Controller restriction of processing when you have contested the accuracy of the personal data (for a period enabling the Controller to verify the accuracy of the personal data) or if the processing is unlawful but you oppose the erasure of the personal data and request the restriction of their use instead; or if they are necessary for the establishment, exercise or defence of a right in legal proceedings, while they are no longer necessary to the Data Controller.	Forms on website

Right to data portability (Art. 20)	You have the right to receive, in a structured, commonly used and machine-readable format, personal data that relates to you, and you have the right to transmit that data to another data controller, if the processing: (i) is based on consent, (ii) on a contract, and (iii) if the processing is carried out with automated means, unless the processing is necessary to carry out a task in the public interest or is connected to the exercise of public powers and such transmission does not infringe the right of others.	The right may be exercised by starting the relevant procedure with the DPO
Right to object (Art. 21)	You may object to the processing of your personal data for direct marketing purposes, at any time. In such a case your personal data will no longer be processed for that purpose.	Forms on website
Right to lodge a complaint with a Supervisory authority		

The personal data you provide may be processed by the Data Controller with or without the use of automated means.

Please also note that the communication of your personal data for the obligatory purposes is a legal or contractual obligation, or is a necessary requirement for the fulfilment of a contract. You are therefore obligated to provide your personal details because otherwise it will not be possible to manage the relationship with the Company.