

**In application of EU Regulation 2016/679 of 27.4.2016 and of the Privacy Code
Legislative Decree 196/2003 (compatibly with the regulation of EU Reg. 679/2016)**

We inform our Customers and Suppliers, that the regulations referred to in the epigraph provide principles and tools to protect people when processing their personal data.

In accordance with the regulations, personal data processing means any operation or set of operations performed with or without the use of automated processes and applied to personal data such as collection, registration, organization, structuring, storage, modification, extraction, consultation, use, communication by transmission, comparison or interconnection, limitation, cancellation or destruction.

This treatment will be based on principles of correctness, lawfulness, transparency and protection of confidentiality.

In accordance with articles 13 and 14 of EU Regulation 2016/679 and of the Privacy Code - Legislative Decree 196/2003 (compatibly with the regulation of EU Reg. 679/2016), we communicate the following information.

art. 1 Data processed, legal basis and purpose of data processing:

The data processed are common personal data, collected in the management of relations with customers and / or suppliers for the fulfillment of the obligations deriving from the law, the contract, uses or habits, with regard to supply contracts and / or purchase and sale, their management and execution and fulfillment of any tax, social security and administrative duties.

The processing is aimed at fulfilling the obligations and exercising the specific rights of the customer or supplier:

- manage the commercial, contractual and financial relationships established;
- execute a service or one or more contractually agreed or related operations, including the acquisition of preliminary information upon conclusion of the contract;
- perform legal obligations in general, to comply with all the transactions imposed by regulatory obligations, the provisions of the law, the conduct of the business and the prescribed provisions on anti-money laundering;
- meet operational or management needs, including management of relations with the Customer and / or Supplier for administration, accounting, orders, shipments, invoicing, services, management of any disputes;
- provide news and information related to the activity, including those relating products, services and future commercial initiatives;
- provide technical support, after-sales assistance and verification of customer satisfaction;
- perform from part of the owners, any market analysis and internal statistics, both with automated contact methods (e-mail, sms, mms, whatsapp) and traditional (post);
- manage and execute the necessary customs procedures in the case of import / export activities, including storage at its customs warehouses and assistance in inspection by the competent Authorities;
- perform the transport, logistics and management services for the shipment of requested goods;
- possibly conserve the goods entrusted in custody-storage;
- perform all the necessary procedures for the correct and complete management of the shipment and / or goods in transit;
- propose announcements of products, services and offers in relation to services
- send via e-mail, post and / or sms and / or telephone contacts, newsletters, commercial communications and / or advertising material on products or services offered by the Data Controller and detection of the degree of satisfaction on the quality of services, also by including in mailing lists;
- send via e-mail, mail and / or sms and / or telephone contacts commercial and / or promotional communications of third parties (for example business partners);
- authorize the communication of personal data to public bodies and companies of a private nature for the purposes indicated in the information sheet

The data are processed without the express consent (Article 6 letter b and e) of EU Regulation 679/2016 and the communication of personal data is a necessary requirement for the conclusion and execution of the contract.

art. 2 Methods of data processing:

Data processing will be carried out both manually and electronically, using appropriate tools to guarantee security and confidentiality and may also be performed using automated tools to store, manage and transmit the data.

It is possible to provide, with tools and procedures that guarantee the security and confidentiality of data, their collection, registration, conservation, organization, processing, profiling for organizational purposes, selection, extraction, comparison, interconnection, communication, blocking, cancellation, destruction.

art. 3 Data retention period:

The personal data are kept for the whole period necessary to fulfill the expectations on the art. 2. and in any case, in compliance with legal obligations, for a period not exceeding ten years from the end of the relationship.

Specifically, for administration, accounting, orders, management of the entire production flow, assistance and maintenance, shipping, invoicing, management of any disputes: 10 years as established under art. 2220 of the Civil Code, without prejudice to any delayed payments of the sums that justify its extension.

For marketing purposes, the collected data is kept for a period of no more than five years from the date of data collection.

art. 4 Nature of the provision of data

The provision of data is optional but necessary to establish and continue commercial and / or contractual relations between the interested party and **Instrumentation Devices s.r.l.** based in Via Acquanera 29, Como (CO) - VAT number 02053410136, in person of the legal representative (hereinafter "the data controller " or "the Company")

Failure to provide it will result in the inability to establish and / or continue the relationship.

art. 5 Subjects to whom data may be communicated

The data that will be processed for the duration of the contractual relationship and subsequently for the fulfillment of legal obligations, may be communicated to any business partners, subsidiaries and affiliates of the Controller, to consultants within the limits necessary for the performance of their duties at the Company, producers, distributors, suppliers of the Data Controller within the limits necessary for carrying out the activities subject to the contractual relationships and / or requests of the interested party, transport companies for goods and customs dispatches, bank institutions for the management of payments, financial administrations and public bodies in fulfillment of regulatory obligations, companies and law firms for the protection of contractual rights, competent judicial authorities and investigative in case of express request by the same Authorities, to the authorized persons of the treatment and, for the purposes indicated above, to external collaborators, to subjects operating in the fields of privacy or IT, to the contractual counterparts and related defenders and, in general, to all those subjects to whom communication is necessary for the correct fulfillment of the purpose.

art. 6 Possibility of transferring personal data to third countries

The data controller may transfer personal data to third countries that guarantee an adequate level of protection pursuant to art. 45 of EU Regulation 2016/679 or to other third countries where the transfer of data is necessary for the execution of the contract or the execution of pre-contractual measures taken at the request of the data subject pursuant to art. 49 of the aforementioned EU Regulation.

art. 7 Access to personal data and complaint methods:

It is specified that, with reference to the personal data provided, the following rights may be exercised pursuant to Arts. from 15 to 22 of EU Regulation 679/2016:

- ask the data controller to access personal data, correct or delete them or limit the processing. The corrections, deletions or limitations of the processing performed at the request of the interested party, unless this proves impossible or involves a disproportionate effort, will be communicated by the data controllers to the recipients (Article 15, 16, 17, 18 EU Regulation 679/2016);
- oppose in whole or in part:
 - a) for legitimate reasons, the processing of personal data;
 - b) to the processing of personal data for purpose of sending advertising material or for carrying out market surveys or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and / or through traditional marketing methods by telephone and / or post.
- data portability as governed by art. 20 of EU Regulation 679/2016;
- revoke the consent at any time without prejudice to the lawfulness of the treatment based on the consent given without the revocation (Article 7 EU Regulation 679/2016);
- propose a complaint to the Guarantor for the protection of personal data, following the procedures and indications published on the official website of the Authority (Article 77 EU Regulation 679/2016);

It is possible to request a copy of the personal data processed by contacting the data controller's offices or sending the related request to the **privacy@instrumentation.it**

It is also possible to ask the data controller to rectify or delete personal data, to oppose their processing or to request their limitation

The exercise of the rights referred to in the preceding points is not subject to any form constraint and is free of charge.

The Data Controller is required to provide an answer within one month of the request, extending up to three months in case of particular complexity of the request.

art. 8 Data controller and responsible for processing:

Data controller, pursuant to art. 13 co. 1 let. a) of EU Regulation 679/2016 is **Instrumentation Devices s.r.l.** based in Via Acquanera 29, Como (CO) - VAT number 02053410136, in person of the legal representative.

The list of data processors and of any persons in charge is kept at the headquarters of the data controller and made available at the request of the data subject.

The details that allow you to quickly contact the data controller and communicate directly and effectively with him, including the e-mail address, is as follows: tel. +39.031.525.391, fax. +39.031.507.984, email ***privacy@instrumentation.it***