

MILLBO S.r.l.

Via Bellaria, s.n.

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11/06/2024

TREATMENT OF CUSTOMERS PERSONAL DATA

Information on processing of personal data according to art. 13 e 14 of Regolamento UE 2016/679 (GDPR)

1. Controller

The Controller is the enterprise Millbo s.r.l., in the person of its legal representative, Alessandro Boggiani, with headquarters in Via Bellaria, s.n. 28069 Trecate (NO), e-mail info@millbo.it, telephone 0321795911.

2. Data subject'

"Data subject'" is the person whose data are collected: in this information document the Customers of the Controller are named "data subject'".

3. Data Protection Officer (DPO/RPD)

The DPO of the enterprise is the lawyer Martina Marchetti, contact details: e-mail: marchetti@avvocatomartinamarchetti.it, website www.marchettilegalprivacy.it

4. Purpose of data processing

The common personal data of the Addresses will be processed by means of electronic processing or in hardcopy form with the purpose of working on preliminary activities connected and subsequent to the purchase/supply contract of the products offered by the Controller.

In detail, the data processing is finalized to the order management (with relevant transport documentation), production, shipment, invoicing and payment management, actions on possible non-conformities and/or reports, the administration of contract and conventional guarantees, together with the fulfillment of legal obligations and the fulfillment of the regulation that the Controller must respect.

The obligations to which the Controller shall fulfill according to the contract and to specific legislation that govern it are also those of accountability and fraud (also contractual) prevention.

By way of example, the personal data processed by the Controller are: name, surname, social security number (codice fiscale), VAT number, date/place of birth, physical and telegraphic address, telephone and mobile number, fax number, of the legal representatives of the Client companies or of the employees of the Client companies.

Personal data might be processed for "soft spam – direct marketing" purposes through a commercial newsletter service. The subject of this service could be communications related to products similar to those sold by the Controller. Everyone will be able to communicate the intention not to receive any direct marketing communication at any time.

5. Conditions of lawfulness of data processing (legal basis)

Personal data processing as per point 4) is legitimate since:

- processing is necessary for the performance of a contract in which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract; (art. 6, lett. b) of GDPR);
- processing is necessary for compliance with a legal obligation to which the Controller is subject (art. 6 lett. c) of GDPR);
- processing is necessary for the purposes of the legitimate interests pursued by the Controller (soft spam – direct marketing - art. 6, lett. f) of GDPR): thus, for this activity prior consent from the Data subject is not necessary; the Controller will be able, in any case, to oppose and revoke the processing of the data for the purpose of direct marketing.

6. Recipients

The disclosure of personal data mainly happens towards third parties and/or recipients whose activity is necessary for the correct execution of the production service or to improve the products that the Controller offers. The disclosure may also be necessary to comply with specific legal requirements or prescriptions for controlling and supervision of the enterprise activities.

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In detail, the data referred to in point 4) shall be disclosed to:

- Bodies, professionals, companies and/or other structures connected to the fulfillment of administrative, accounting and managing obligations linked to the carrying out of the economic activity, and with the purpose of debt collection;
- Banks, financial institutions of other subjects to whom the disclosure of these data is necessary for the Controller's conduct of business, in relation to the deriving fulfillment or connected with the existing relation among the parties.
- Supervisory Bodies, Legal Authorities, insurance companies for the provision of insurance services, and to public authorities, administrations and other parties to whom the disclosure is required by law or for the defense of a right of the Controller in case of litigation (both in court or out of court).

The third parties to whom the data are disclosed shall act as autonomous Controller or Processor to art. 28 GDPR. The full list of the Processors of the processing to whom the data are disclosed is available at the headquarters of the Controller. Every employee of Millbo has been instructed on the treatment of personal data collected during their working activity.

7. Transfer of personal data

Personal data are stored on servers in the territory of the European Union. If services that require the data storage on servers outside the European Union are used, the Controller guarantees that this disclosure will take place in full respect and will meet the requirements of the applicable laws. Where necessary, standard contractual clauses required by European Commission will be signed, as per articles 44 and 46 of GDPR.

8. Data retention period

Personal data are kept for the time necessary to fulfill the purposes as expressed in point 4) and anyway for not more than 10 years after the buying date of the products.

9. Data provision

Personal data provision is a compulsory requirement for the conclusion of the contract. Without the provision of personal data it will be impossible to build a relationship.

10. Rights (artt. 15 and following of GDPR)

The data subject shall have the right to obtain from the Controller:

- access to the personal data
- the rectification of inaccurate personal data concerning him or her
- the erasure of personal data concerning him/her without undue delay
- restriction of processing

The data subject shall have the right to receive from Controller the personal data concerning him or her in a structured, commonly used, and machine-readable format: Controller transmits those data to another Controller.

Rights can be exercised by filling the "modulo di esercizio dei diritti degli interessati", available for download on the website. Moreover, a complaint can be lodged to the Garante della Privacy (<https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524>)