

Company

Sender: **SDM SRL**
Headquarters: Corso Peschiera, 191 – 10141 Torino (TO) – Registered office
Via Biella, 72 – 10098 Rivoli (TO) Field office
Via Bertolo, 1 – 10040 Almese (TO) Administrative address
Tool Engineering Sp z o.o.
Ul. F. Kamińskiego 19/106 43–300 Bielsko-Biała – Poland

As Data Controller of personal data, in accordance with EU Regulation 2016/679 "European Regulation" and the national regulations applicable to this sector we inform you that the processing of your personal data is carried out in the company structure in full respect of the aforementioned norms, guaranteeing respect for fundamental freedom rules and the dignity of the interested party, in particular protecting privacy and data protection. We point out that the disclosure relates to personal data provided by the data subject or its designates and any data requested in the future compatible with the purposes indicated below, obtained directly from them or through systems where the data subject can release his information for be subsequently contacted by the undersigned company.

Pursuant to art. 13 and 14 of the Rules, we provide the following information:

▪ **Method of treatment**

The processing of data can be carried out in paper form and / or through the use of computer systems and related electronic equipment (even remote with appropriate systems of protection and security), by persons specifically appointed and instructed on security and data processing, for the below listed purposes. Further processing for different purposes will be the subject of specific information with relative consent if due in relation to the mandatory rules.

▪ **Purposes pursued**

- A Administrative, accounting and fiscal management of the company (quotations, invoicing, work organization, notifications and bureaucratic requirements, etc.)
- B Operational management and internal / external logistics
- B (delivery and / or collection of goods or products / services, communications concerning the status of procedures or work)
- C Management of the assignment / service / order / processing assigned (quotation, order fulfillment, order checking, completion / production)
- D Management of any dispute between the parties (complaints, breaches of contract between the parties, violations of rules, etc.)
- E Archiving of technical / administrative documentation
- E (in relation to legal obligations, keeping of fiscal and contractual documents, contractual and warranty communications)

▪ **Communication of personal data**

The data at our disposal will be processed by internal subjects (persons in charge and managers) in relation to the functions held within the organization in order to pursue the above listed purposes and on the basis of the relationships between the parties. Due to specific activities related to particular professional and / or technical figures, the organization also resorts to subjects external to the structure, involving data processing. These persons are appointed as external managers of the treatment and therefore subject to the obligations that the current legislation imposed.

The categories of recipients are the following:

INTERNAL

Employees of the company or collaborators under different contractual form directly controlled by the Controller

EXTERNAL

Tax consultancy firms (accountants, tax consultants, etc.)

Partner companies necessary for further processing if required by the assigned contract

Communication to parties outside the organization will be carried out within the strict limits of the need to follow the customer's requests and the correct development of the order received or in accordance with legal obligations (eg. accounting and tax company). It means that not all the above mentioned subjects will be able to process the data, but only the internal or external figures in charge of performing a particular mandatory treatment.

▪ **Transfer of data to a third country or to international organizations**

For the activities involving the processing of personal data, the data controller does not transfer data to a third country or to international organizations.

- **Obligation (or non) of the data sharing**

The processing of personal data is only admissible upon their sharing by the interested party. This transfer may be optional or compulsory pursuant to the legislative regulations applicable in relation to the objectives pursued. Due to the principle of the "necessity" of the data (thus excluding the request for data not strictly necessary), the interested party is informed that for the purposes reported his refusal to share the data will in fact make it impossible to carry out the planned treatments, preventing the services provided by the relationship between the parties or the fulfillment of particular legal obligations.

- **Data retention**

The storage of the collected data, without prejudice to the exercise of the rights of the interested party as indicated below, is extended to the strict time necessary to complete the order, task or service requested, as well as any data storage provided for guarantees, by state or European regulations (eg storage of tax documents). The information, even of a sensitive nature that is no longer necessary or to be retained by virtue of regulations or for the protection of the data subject, will be destroyed (or become unusable) or returned if there are original documents, without keeping copies. Further information on the storage periods in relation to the various cases may be requested from the data controller and his contact persons through the communication channels indicated in this statement.

- **Profiling and automated processes**

The processing of personal data is managed without the intervention of automated systems or processes, which could cause decisions impacting on data processing and on the legitimate interests of the data subject, therefore the profiling of the data subject is not foreseen.

- **Data controller**

In accordance with the EU Regulation the figure identified as Data Controller to whom it is possible to send any request and to exercise the rights guaranteed to the interested party pursuant to art. from 15 to 22 of EU Reg. 2016/679 and national rules applicable to the sector is:

SDM SRL

Via Biella, 72 – 10098 Rivoli (TO)

Tel. 011 9094536 Mail. info@sdmtooling.com

- **Managers and / or reference subjects**

The figure (s) identified as the referent (s) for information requests and the exercise of the rights listed below is / are:

Privacy administrative manager (to be quoted in the request)

- **Rights of the interested party (Article 15 to 22 EU Reg)**

The interested party may exercise the following rights, without prejudice to any particular obligation to which the organization is obliged to comply pursuant to the EU Regulation and other legislative provisions regulating the management of particular personal data:

1. The interested party has the right to obtain confirmation of the existence or not of personal data concerning him / her, even if not yet registered, and their communication in comprehensible form.

2. The interested party has the right to obtain information concerning:

a) the origin of personal data and categories;

b) the purposes and methods of the processing, as well as the duration of the storage;

c) the method applied in case of treatment carried out with the aid of electronic instruments;

d) the identification details of the Controller, of the managers and of the designated representative;

e) the subjects or categories of subjects to whom the personal data may be communicated or who may come to know them in the territory of the State, European Union or third countries, as managers or agents and to receive information about adequate guarantees for the transfer and treatment.

3. The interested party has the right to obtain:

a) updating, rectification or, of interested, integration of data;

b) cancellation (right to be forgotten), transformation into anonymous form or blocking of data processed, including those whose retention is not necessary for the purposes for which the data were collected or subsequently processed, without prejudice to obligations of a regulatory nature or of protection of the data subject and in particular in case of illicit processing;

c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated, except if such fulfillment becomes impossible or involves the use of means clearly disproportionate in relation to the protected right.

4. The interested party has the right to oppose or limit, in whole or in part:

a) on legitimate grounds, the processing of personal data concerning him / her, even though they are relevant to the purpose of the collection;

b) the processing of personal data concerning him / her referring to automated processes or deriving from

profiling (without prejudice to contractual obligations stipulated between the parties), with particular regard to marketing purposes and similar.

5. The interested party also has the right:

- a) to make a formal complaint to a supervisory authority (more information on www.garanteprivacy.com);
- b) to receive information on the origin of the data if they have not been collected directly from the data subject;
- c) to receive a copy of the data stored within the limits of the protection of the rights and freedom of others;
- d) to request data portability, where the nature of the processing makes it technically feasible.

Further information can be obtained from the data controller or by consulting the articles of the standard rules mentioned.