



## INFORMATION

Data 08/05/2018

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Pantex International S.P.A. as Controller of its personal data processing, pursuant to and for the purposes of Legislative Decree 2003/196, hereinafter "Privacy Code", and following European Regulations 2016/679, hereinafter referred to "GDPR", hereby informs you that the aforementioned regulations provide for the protection of persons and other subjects regarding the processing of personal data and that this treatment will be based on principles of correctness, lawfulness, transparency and protection of your privacy and your rights. Your personal data will be processed in accordance with the legislative provisions of the aforementioned regulations and the confidentiality obligations laid down therein.

**Object of the treatment:** The Data Controller processes personal, identifying and non-sensitive data communicated by you (in particular, name, surname, tax code, VAT number, email, telephone number, bank and payment details) at the signing of the contract for services provided by the Controller.

**Purposes of treatment:** in particular, your data will be processed for purposes related to the implementation of the following obligations, related to legislative or contractual obligations:

- accounting or treasury management;
- customer management;
- litigation management;
- commission management;
- obligations required by law in the field of taxation and accounting.

The processing of functional data for the fulfillment of these obligations is necessary for a proper management of the relationship and their conferment is mandatory to implement the aforementioned purposes. The Data Controller also states that they are indispensable for the continuation of the relationship and that any non-communication, or incorrect communication, of one of the mandatory information, may cause the Data Controller's inability to guarantee the adequacy of the processing itself.

Your personal data may also, with your approval, be used for the following purposes:

- activity planning,
- billing history of customers,



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- supply order history,
- quality management,
- management control,
- level of customer satisfaction measurement,
- possibly to satisfy market and statistical surveys and for promotional activities,
- to provide information on future commercial initiatives and announcements of new products, services and offers, both from us and from affiliated and/or subsidiaries and commercial partners,
- sending business information by fax, e-mail or text message,
- information via telematic means,

The provision of data is optional for you regarding the aforementioned purposes, and his possible refusal to treatment does not compromise the continuation of the relationship or the adequacy of the treatment itself.

**Processing methods:** The Data Controller processes the Personal Data of Users by adopting appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data.

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The processing is carried out through IT and telematic tools and / or manually (e.g. on paper) for the time strictly necessary to achieve the purposes for which the data were collected or on specific request for cancellation by the interested party.

Each processing takes place in compliance with the Privacy Code and the subsequent GDPR through the adoption of security measures provided by the technical specification (Annex B).

**Access to data:** In addition to the Data Controller, categories of Managers, persons in charge or Third parties involved in the company organization may have access to the Data (administrative, commercial, marketing, legal, system administrators) or external subjects (as suppliers of third party technical services, mail carriers, hosting providers, IT companies) appointed as Data Processors by the Data Controller. The updated list of Processors can always be requested from the Data Controller.



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**Communication:** your data will be stored at our office and will be communicated exclusively to the competent subjects for the performance of the services necessary for a proper management of the relationship, with a guarantee of protection of the rights of the interested party.

Your data will be processed only by personnel expressly authorized by the Controller. The collected personal data may also be disclosed to the categories of subjects, appointed external processors, who perform instrumental activities connected to the provision of services and the performance of the Company's activities.

These categories include those that, for example, carry out the following activities:

- Website hosting and management services
- Accounting
- Billing
- Treasury
- Commercial
- Quality
- Purchases
- Informative systems
- Expeditions

Your data may be disclosed to third parties. Without the need for an express consent (art. 6 lett. b) and c) of the GDPR, the Data Controller may communicate your data for the purposes referred to in art. 2.a to Supervisory Bodies (like IVASS), Judicial authorities, as well as to those subjects to whom the communication is mandatory by law for the accomplishment of the said purposes. These subjects will process the data in their capacity as independent data controllers.

**Data Transfer:** The management and storage of personal data will be carried out within the European Union on servers of the Data Controller and / or of designed third-party companies duly appointed as Data Processors. Currently the servers are located at the operational headquarters of the Data Controller. In any case the Data Controller, where necessary, will have the right to move the server location to Italy and / or to the European Union and / or non-EU countries.



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In this case, the Data Controller hereby ensures that the transfer of data in non-EU countries will take place in accordance with the applicable legal provisions. Agreements will be concluded, if necessary, to guarantee an adequate level of protection and standard contractual clauses provided by the European Commission will be adopted.

**Disclosure:** Your personal data will not be disclosed in any way.

**Cookies:** The use of cookies, or other tracking tools by this Application or by applications of third party service providers, unless otherwise specified, has the purpose of identifying the User and recording the related preferences for purposes strictly related to the provision of the service requested by the User. For more information please see the document: Cookies Policy.

**Rights of the interested party:** As interested party, you have the rights set forth in art. 15 of the GDPR and precisely the rights of:

- obtain confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
- obtain the indication of a) the origin of personal data; b) of the purposes and methods of treatment; c) of the logic applied in case of treatment carried out with the aid of electronic instruments; d) of the identification details of the Data Controller, of the Data Processor and of the designated representative pursuant to art. 5, paragraph 2 of the Privacy Code and art. 3, paragraph 1, GDPR; e) the subjects or the categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the territory of the State, managers or agents;
- obtain: a) updating, rectification or, when interested, integration of data; b) the unlawfully cancellation, transformation into anonymous form or blocking of processed data, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; c) the attestation that the operations referred to letters a) and b) have been made known, also as regards their content, to those to whom the data have been communicated or disclosed, except in the case where this fulfillment proves impossible or involves a use of means manifestly disproportionate to the protected right;

- to object, in whole or in part: a) for legitimate reasons, to the processing of personal data concerning you, even if they are relevant to the purpose of the data collection; b) the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research 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 paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated method, it extends to the traditional ones and that in any case the possibility remains for the person concerned to exercise the right of opposition even partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or none of the two types of communication.

Where applicable, it also has the rights referred to Articles 16-21 GDPR (Right of rectification, right to be forgotten, right of limitation of treatment, right to data portability, right of opposition), as well as the right to complain to the Guarantor Authority.

**How to exercise the rights:** You can exercise your rights at any time by sending:

- a registered letter to Pantex International S.P.A. – Via della Repubblica 48 – Zona Industriale 67039 Sulmona (AQ);
- an e-mail to: [info@pantexglobal.com](mailto:info@pantexglobal.com)

**Minors:** The Data Controller's Services are not intended for minors under the age of 18 and the Data Controller does not intentionally collect personal information about minors. In the event that information on minors were unintentionally registered, the Data Controller will delete them in a timely manner, at the request of users.

**Changes to this information:** The Data Controller reserves the right to make changes to this policy at any time by giving notice to Users on this page. Please, therefore, consult this page often, referring to the date of the last modification indicated at the bottom. In case of non-acceptance of the changes made to this privacy policy, the User is required to cease using this Application and may request the Data Controller to delete their



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Personal Data. Unless otherwise specified, the previous privacy policy will continue to apply to Personal Data collected up to the time of modification.

**Information not contained in this policy:** More information in relation to the processing of Personal Data may be requested at any time to the Data Controller using the contact information.

**Data Controller:** the Data Controller is PANTEX INTERNATIONAL S.P.A. – Via Bologna 7, 20060 Trezzano Rosa (Mi), Italy; P.Iva 01027510476; e-mail: [info@pantexglobal.com](mailto:info@pantexglobal.com). The Data Controller is responsible for this privacy policy.

**Data Processors:** The updated list of Data Processors, Data Processors or Third Parties and any Data Protection Officer is kept at the registered office of the Data Controller.