

**POLICY  
REGARDING PROTECTION OF PERSONAL DATA  
PURSUANT TO ARTICLE 13 (EU) REGULATION No.  
2016/679**

✓ **Identification details of the Data Controller**

The Data Controller of the processing is: SPARES & MORE S.R.L., with registered office in Loc. Zinepri, Zona Industriale, 55027, Gallicano (Lucca), in the person of its legal representative *pro tempore* Franco Mariani, e-mail: info@spares-more.it, with regard to your data qualified as personal pursuant to EU Regulation 2016/679, for the establishment and management of current relations held with you.

✓ **Types of Data Processed**

The following may be subject to processing:

personal, identification and accounting, fiscal and administrative, commercial and IT data (e.g. name, surname, tax code, VAT, e-mail, telephone number, etc.) directly related to you, acquired in the execution and development of relations with the Data Controller.

✓ **Purpose and legal basis of the processing**

Personal data will be processed for the following purposes:

- a) operations strictly connected with and instrumental to the initiation of contractual relations, including the acquisition of information prior to the conclusion of the contract, as well as the provision of the services requested;
- b) to fulfil the obligations provided for by the regulations (e.g. fulfilments regarding transparency, anti-corruption) or by an order of the Authority;
- c) exercising the rights of the data controller (e.g. right of defence in court for breach of contract).

The legal basis for the processing is the desire to implement the contract or the contractual measures required.

In addition, the Data Controller is authorised to process personal data where the processing:

- is necessary to fulfil a legal obligation to which the data controller is subject;
- is necessary for the implementation of the contract or of the pre-contractual measures required.

✓ **Processing methods**

The data processing is carried out in accordance with the principles of correctness, necessity, pertinence, adequacy and not excessive processing, using means and instruments, both electronic and manual, made available to subjects acting under the authority of the Data Controller and authorised and trained for the purpose. They are granted access to the personal data provided to the extent and within the limits that is necessary to perform the activities. The paper and, in particular, electronic files where your data is archived and stored are protected by effective and adequate security measures to counter the risks of violation considered by the Data Controller. The Data Controller shall periodically and constantly check the measures adopted, especially for the electronic and telematic instruments, the constant updating of which is guaranteed, in order to ensure the confidentiality of the personal data through the processing, archiving and storage of such data, especially if they belong to particular categories. The Data Controller verifies, also through the subjects authorised to perform the processing, that personal data that does not need to be processed is not collected, processed, archived or stored; verifies that the data is stored with the guarantee of integrity and authenticity and their use for the purposes of the processing actually carried out.

The data shall be stored in paper, computer and telematic archives located within the European Economic Area, and appropriate security measures shall be ensured.

✓ **Nature of the conferment of the data and consequences of refusal**

The provision of the data is mandatory for all the legal and contractual obligations required and therefore without which it would be impossible for the Data Controller to fulfil the contractual relationships.

✓ **Processing location**

The data is currently processed and stored at the registered office of SPARES & MORE S.R.L., Loc. Zinepri, Industrial Zone, 55027, Gallicano (Lucca).

✓ **Transfer of the data abroad**

The data collected will not be transferred to third countries or international organizations.

✓ **Recipients of the data**

Without prejudice to communications made in execution of legal obligations, the data may be communicated to: credit institutions, credit collection companies, credit insurance companies, professionals and consultants for the sole purpose of credit protection and the best management of our rights relative to the single commercial relationship.

For the same purposes, the subjects to whom the personal data may be communicated or who may learn about them as authorized and / or responsible individuals are represented by the workforce.

In addition, logistic companies (carriers, forwarding agents, etc.) and companies that carry out IT consultancy activities for the implementation of the software and hardware maintenance operations may also become aware of the data.

The data shall not be disseminated.

✓ **Data retention policy**

The data will be kept for the time necessary to carry out the administrative, accounting and fiscal purposes relating to the relationship established and also resulting from the obligations provided for by law, in any case within the time limits established for the rights and obligations underlying the processing and without prejudice to any objection to the treatment.

The personal data will be processed, subject to any opposition to processing, according to the following criteria:

- for the time necessary for the performance of any services requested.
- for the time necessary to fulfil legal obligations, administrative, accounting and fiscal purposes relating to the relationship established.
- for the time necessary to achieve the purposes for which they are processed.

✓ **Automated decision making process**

In order to pursue the processing, no decision shall be taken based solely on the automated processing which may produce legal effects that concern you or which significantly affects your person in a similar way, including profiling.

✓ **Rights of the interested party**

Except for the cases referred to in Article 23 concerning legal obligations, public interest or the exercise of public authority, the interested party may exercise the rights provided for in Article 15-22 with regard to the data controller.

- Confirmation that your personal data is being processed or otherwise and, in this case, to obtain access (right of access) art. 15;
- the correction of inaccurate personal data, or the integration of incomplete personal data (right of correction) art.16;
- the deletion of the data, if one of the reasons provided for in the Regulation exists (right to be forgotten) art.17;
- the limitation of the processing when one of the hypotheses provided for by the Regulation (right of limitation) art.18 occurs;
- to receive in a structured, commonly used format and legible by an automatic device the personal data provided by you to the Data Controller and to forward such data to another data controller (right of portability) art. 20.
- the opposition to the processing of personal data (right of opposition) art.21.
- the right not to be subject to a decision based solely on automated processing, including profiling (automated decision-making process concerning natural persons) Article 22.

The exercise of rights is not subject to any restriction of form and is free of charge.

✓ **Exercise of the rights and revocation of the processing consent**

In the event of a request by the interested party for information relating to their data, the Data Controller must proceed without delay - unless it proves impossible or involves a disproportionate effort - and, in any case, no later than 1 month after receipt of the request. The time limit may be extended by up to 3 months, if necessary, taking into account the complexity and the number of requests received by the Data Controller. In such cases, the Data Controller shall inform you within one month of receipt of your request and will keep you informed of the reasons for the extension.

For any further information and in any case to send your request, please contact the Data Controller at the e-mail address: [info@spares-more.it](mailto:info@spares-more.it) or by post at the address: Loc. Zinepri, Industrial Zone, 55027, Gallicano (Lucca).

✓ **Complaints procedure**

Without prejudice to any other administrative or judicial action, the interested party has the right to lodge a complaint with the competent supervisory authority.

For further information, please consult the institutional website of the Privacy Guarantor: [www.garanteprivacy.it](http://www.garanteprivacy.it)

Any significant updating of the company's policies on the processing of personal data will be communicated to you in a timely manner and by appropriate means.

Gallicano, 15-05-2019