



**3C CATENE SRL** - Via Fontanella, 19 - 23900 Lecco ITALY  
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 info@catene3c.it - PEC 3ccatene@legalmail.it - www.catene3c.it  
 Codice Fiscale e Partita IVA 01728390137 - R.E.A. n. 211.944 - A.I.A. n. 70.077  
 Capitale Sociale 25.000 € interamente versato



## Policy in accordance with article 13 of EU Regulation n. 2016/679 with regard to personal data processing

Pursuant to and by effect of art. 13 of EU Regulation n. 2016/679 with regard to personal data processing, *3C CATENE SRL*, with registered office in Via Fontanella 19 23900 Lecco (LC), acting as owner of this policy, is willing to inform you about the processing of personal data, which was gained through current trade relations between the parties.

Having respect toward the above mentioned regulation, this treatment will be shaped on principles of correctness, lawfulness, transparency and safeguard of privacy as follows.

### 1. Object of treatment

Your personal data gathered and treated by us, are:

- identification (biographical, registered office/address, telephone, fax, e-mail, PEC, financial, etc.)
- related to economic and trade activities (orders, bank, accounting and financial data, etc.)

### 2. Treatment purposes:

Your personal data are treated:

A) without consent (art. 6 lett. b and e of EU Regulation n 2016/679), for the following policy purposes:

- To finalize the contracts between the parties;
- To fulfill precontractual obligations, trade relations of any kind, as well as contractual and financial ones deriving from current relations;
- To fulfill obligations provided for by law, policy, community legislation or directive of the authority (for example concerning anti-money laundering), according to art. 6 clause 1 lett. c of EU Regulation n. 2016/679;
- To Exercise the rights of the owner, for example defense in court, according to art. 6 clause 1 lett. f of EU Regulation n. 2016/679.

In each of these cases, data conferment is essential for the exact execution of a contract (of which you are a party) or of precontractual measures, chosen on request between the parties; it finds its legal basis in processing of data according to art. 6 clause 1 lett. b and c of EU Regulation n. 2016/679. Lacking conferment prevents the finalization of the contract or of other above mentioned measures.

B) Only after previous specific and explicit consent (art. 6 clause 1 lett. a and 7 EU Regulation n. 2016/679), for the following marketing purposes:



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- newsletters, trade communications and/or advertising material such as products, services, updates, events about *3C CATENE SRL*.
- survey on customer satisfaction concerning the relationship with *3C CATENE SRL*.

Data conferment for the in art. 2.B mentioned purposes is optional, therefore you can decide not to consent to the treatment or, at a later time, to refuse the possibility of treating the already given data through the revocation of consent, according to art. 7 clause 3 of EU Regulation n.2016/679. In that case, you will no longer receive newsletters, trade communications, info and advertising material from our part.

In case you are already our clients, we will be authorized to send you trade communications concerning similar services and products to the ones you have already benefitted from or bought; however, you do have the right to revoke the already given consent in any moment (according to art. 7 clause 3 of EU Regulation n. 2016/679). We underline that the revocation of consent does not jeopardize the lawfulness of the treatment executed before the revocation itself.

### 3. Manner of data treatment and preservation

- Your personal data treatment is carried out through procedures shown in art. 4 n. 2 of EU Regulation n. 2016/679 such as: collection, registration, organization, structuring, preservation, consultation, processing, adaptation or modification, selection, extraction, comparison, utilization, interconnection, block, communication through transmission or any other form of making available, limitation, cancellation and destruction of data.
- Thanks to electronic, digital and telematics devices, as well as paper, gained data will be processed from specifically appointed (and trained) intern collaborators and employees or from external supervisors of this treatment, in order to fulfill the above mentioned purposes.
- Data are stored both on paper and in digital archives, meeting security measures of technical and organizational nature dictated by law, with the aim of guaranteeing confidentiality and privacy of personal data, choosing security measures; these are meant to avoid alteration, loss, non-authorized treatment and access and are supposed to guarantee integrity and privacy of personal data.
- According to the minimization principle, your data will be adequately treated, with pertinence and only for purposes mentioned in point 2, always respecting your current and future will.
- Data treatment does not concern computerized decisional processes, as established by art. 22 of EU Regulation n. 2016/679.

Pursuant to art. 13 clause 2 lett. a of EU Regulation n. 2016/679, the owner specifies that he will treat your personal data exclusively during the time necessary to carry out the above mentioned purposes (also considering the ordinary regulation deadline concerning contractual relations).



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#### 4. Data access

Pursuant to art. 13 lett. e of EU Regulation n. 2016/679, we point out that your personal, accounting and financial data will not be transmitted, sold or exchanged with third parties, except with consultants and technicians as individuals in charge of the treatment, in order to carry out functional activities for the company, such as administrative, operative, accountable, financial and legal ones.

The updated list of the external supervisors and of the individuals in charge of the treatment is safeguarded at the registered office of the treatment accountable person.

Without the necessity of express consent (art. 6 clause 1 lett. b and c of EU Regulation 2016/679), the owner is authorized to transmit your data for the in art 2.A mentioned purposes, to legal authorities and/or administrative and to all of those subjects who must use them for the mentioned purposes. These subjects will handle the data as independent owners of the treatment.

#### 5. Data subjects' rights

As interested subject, pursuant to art. 13 clause 2 lett b of EU Regulation n. 2016/679 you have the right to ask the treatment accountable for the access to your personal data (art. 15 EU Regulation n. 2016/679), its amendment (art. 16 EU Regulation n. 2016/679), its cancellation (art. 17 EU Regulation n. 2016/679), the limitation of data treatment (art. 18 and 22 EU Regulation n. 2016/679), to go against data treatment (art. 21 and 22 of EU Regulation n. 2016/679) and you have the right to data portability (art. 20 EU Regulation n. 2016/679).

As involved subject you will be able to assert your rights addressing *3C CATENE SRL* with registered office in Lecco, Via Fontanella 19, owner of the treatment, using the below mentioned data. You also have the right to complaint to a control authority, according to EU Regulation n. 2016/679 and in particular, according to art. 77 of the same Regulation, to the control authority of the State where you live or work, or of the location where the supposed violation happened, or you can always address the ordinary competent legal authority.

#### Privacy treatment owner

*3C CATENE SRL* with registered office in Via Fontanella 19 23900 Lecco (LC), VAT 01728390137

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#### Privacy treatment accountable

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