

INFORMATION ON THE PROCESSING OF THE PERSONAL DATA RELATING TO THE RELATIONSHIP WITH CUSTOMERS AND POTENTIAL CUSTOMERS

The following information is intended for natural persons, including professionals, owners of individual businesses and representatives/contact people of companies, entities, associations, and foundations, hereinafter "Data Subjects".

The Controller's identity and the contact details

Dal Santo s.r.l., hereinafter "Dal Santo" or the "Controller", with registered office at via Sant'Anna, 38 – 31050 – Vedelago (TV), Italy, and contactable via the email address, info@dal-santo.com, the certified email address, dalsantosrl@postecert.it or by telephone at +39 0423489121.

Purposes for which and the legal bases by which personal data is processed

- A. To manage the pre-contractual phase:** personal data will be processed for all the needs related to dealing with requests for information and/or quotes.
- B. To collect commercial information:** personal data will be processed to collect information to check the Data Subject's economic, financial and credit situation, as well as their solidity, solvency and reliability.
- C. To manage the contractual phase:** personal data will be processed for all the needs related to managing the contractual relationship in all its phases (e.g. management of appointments, organisation of logistics, management of the customer support activities, and fulfilment of the legal obligations to which the Controller is subject).
- D. Direct email marketing:** to use the email contact details to carry out opinion and satisfaction surveys, to send commercial communications relating to products or services or to send invitations to events in which the Controller is participating.
- E. Defensive purposes:** the Controller may need to process personal data in order to manage disputes and claims, whether in or out of court.

Purpose	Legal basis (common data)	Legal basis (special data)
A.	To carry out pre-contractual measures.	/
B.	The Controller's legitimate interest connected to the analysis and definition of business strategies and policies, the identification of suitable parties with whom to establish and continue a business relationship, payment methods and conditions, and the fight against fraud.	/
C.	To execute the contract; To fulfil legal obligations.	/
D.	Consent.	/
E.	The Controller's legitimate interest in establishing, exercising or defending a right.	To establish, exercise or defend a right.

Conservation period

Purpose	Storage time
A.	The time needed to handle the request received and any subsequent follow-ups.
B.	The time needed to carry out the checks.
C.	10 years from the termination of the contract.
D.	24 months from the date on which consent is given.
E.	10 years from the final resolution of the dispute.

The nature of providing data and the consequences in the event data is not provided

Purpose	Nature	Consequences
A.	Necessary	It will not be possible to receive the information requested.
B.	Not applicable	/
C.	Necessary	It will not be possible to establish or continue a business relationship.
D.	Optional	It will not be possible to receive any commercial communications.
E.	Necessary	It will not be possible to manage the dispute.

Scope of communication

Data is processed by internal personnel who have been authorised to perform specific tasks. Data may be communicated outside the company on the basis of the following rules

Purpose	Categories of external recipients
A.	Companies that provide hosting/management services for technological platforms, agents, external consultants.
B.	Business information companies, agents.
C.	Insurance companies, debt transfer companies, agents, credit institutes, external consultants, parties to whom communication is required by law, business partners (customers/suppliers).
D.	Marketing consulting companies, companies that provide hosting/management services for technological platforms.
E.	Law firms; credit collection companies or debt transfer companies; judicial authorities.

Since data is also processed by IT tools, it may also be visible to parties who support and/or maintain these systems.

Transferring data to a third country or an international organisation

The Controller may transfer personal data to countries and under the conditions summarised below:

Purpose	Country	Condition of lawfulness of the transfer
A.	the United States of America, Australia, Singapore, Japan, Colombia, the UK, Canada.	Standard contractual clauses
B.		
C.	the United States of America, Australia, Singapore, Japan, Colombia, the UK, Canada.	Standard contractual clauses
D.	the United States of America, Australia, Singapore, Japan, Colombia, the UK, Canada.	Standard contractual clauses
E.		

The Data Subject's Rights

The party to whom the personal data refers is granted the following rights:

Access: Data Subjects have the right to know whether personal data that concerns them is subject to processing and, if so, to obtain access to it and a copy of it.

Correction: Data Subjects have the right to have the personal data that concerns them updated, corrected (if inaccurate) and supplemented if incomplete.

Deletion: Data Subjects have the right to have the personal data that concerns them deleted provided that certain conditions are met (for more information, contact the Controller).

Restriction: Data Subjects have the right to request that the personal data that concerns them be marked so that its processing in the future is restricted, provided that certain conditions are met (for more information, contact the Controller).

Objection: Data Subjects have the right to object to the processing of the personal data that concerns them, for reasons connected to their particular situation, where processing is based on legitimate interests or is necessary in order to carry out a task of public interest or is connected to exercising public power, of which the Controller is invested; Data Subjects may also object to the processing of the personal data that concerns them for the purpose of direct marketing.

Portability: Data Subjects have the right to receive the personal data that concerns them (as provided to the Controller) in a structured format, and to have this data sent to another controller if processing is based on consent or on a contract and is carried out by automated means.

Revocation of consent: Data Subjects have the right to revoke the consent previously given for the purposes that require it, without prejudice to the lawfulness of the processing carried out up to that point.

The rights that can actually be exercised in relation to the processing activities carried out are:

Purpose	Exercisable right						
	Access	Correction	Deletion	Restriction	Objection	Portability	Revocation of consent
A.	X	X	X	X			
B.	X	X	X	X	X		
C.	X	X	X	X		X	
D.	X	X	X	X		X	X
E.	X	X	X	X	X		

In order to exercise any of the rights listed above, Data Subjects may use the form available at the following link: <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and then forward it to: privacy@dal-santo.com. Data Subjects may make a request to the same address asking for more details regarding the information laid out above (e.g. legitimate interest balancing test or list of processors).

Data Subjects may lodge a complaint with a competent Supervisory Authority. In Italy, this is the Italian Data Protection Authority (www.garanteprivacy.it).