

## Information on personal data processing

Interested Subjects: **Customer and potential customer (natural person)**

**CAEN S.p.A.** – headquartered in via Vetraia, 11, 55049 Viareggio (LU), Tel 0584 388 398, [www.caen.it](http://www.caen.it) – is the **Holder of the personal data processing**, pursuant to and for the purposes of Legislative Decree 196/03 ("Code regarding the protection of personal data"), Regulation (EU) 2016/679 (also GDPR) and D.Lgs. 101/18, hereby informs you that the aforementioned legislation provides 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 confidentiality and your rights. Your personal data will be processed in accordance with the legislative provisions of the aforementioned law and the confidentiality obligations provided for therein.

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

- Customer management, services offered and post-sales assistance;
- Compulsory legal obligations in the tax and accounting fields;
- Detection of customer satisfaction;
- Scheduling of activities;
- Litigation management;
- Customer billing history.

The processing of data, for the fulfillment of these obligations, is necessary for a correct management of the relationship and their provision is obligatory in order to implement the aforementioned purposes. The Data Controller also informs that any non-communication, or incorrect communication, of one of the mandatory information may cause the Data Controller to be unable to guarantee the adequacy of the processing itself.

For the purposes of the aforementioned treatment, the Data Controller may become aware of data that are defined as common and particular, that is, sensitive and judicial pursuant to the Privacy Code, and in particular:

- Contact details such as email address and phone number;
- Personal data and invoicing;
- Information concerning judicial measures.

Your sensitive data being processed are only those strictly relevant to the obligations, tasks or purposes described above and will be treated in compliance with the instructions contained in the relevant General Authorizations of the Guarantor.

Your  personal data may also, subject to your consent (requested at the time of their collection), be used for the following purposes:

- Possible subscription to the newsletter, upon explicit request, for commercial communications;
- Sharing on the company website or company social profiles of personal data, photos and / or videos.

The provision of data is optional for you with regard to the aforementioned purposes, and any refusal to treat it does not compromise the continuation of the relationship or the congruity of the treatment itself, except the impossibility to better serve the customer. These data are useful for optimizing the administrative, commercial and eventually sending promotional material. It should be specified that most of the treatments carried out are not subject to the obligation of acquiring consent pursuant to art.24 of Legislative Decree 196/2003 and art.7 of the GDPR.

It should also be noted that photographs or videos will be acquired during the course of courses, fairs or events organized by the Data Controller only after a request for verbal consent. The persons in charge will ensure that the subjects who have expressly denied consent, possibly documented on a specific form, will be excluded from the images recorded.

**Processing methods:** your personal data may be processed in the following ways:

- Assignment to third parties of processing operations or of legal provisions;
- Creating profiles for internal use, related to customers or consumers;
- Treatment by means of electronic devices;
- Manual processing using paper archives.

Each treatment takes place in accordance with the procedures set out in Chapter II of Regulation (EU) 2016/679 and in Articles.11, 31 and following of Legislative Decree 196/03.

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

Your data will only be processed by personnel expressly authorized by the Data Controller and, in particular, by the following categories of persons in charge:

- Administrative and Human Resources managers and employees;
- Sales and Marketing managers and employees;
- Infrastructure managers and employees;
- Safety and Environment managers and employees;
- IT managers and employees;
- other employees within the limits of the tasks received and as required by company procedures.

Your data may be disclosed to third parties, in particular to:

- Forwarders, Carriers, Post Offices, Logistics Companies;
- Authorized companies, part of the group of companies led by CAEN S.p.A.;
- Consultants and freelancers, also in associated form;
- Professionals in the field of consultancy, training and health and safety: Banks and credit institutions;
- Entities that manage the service of delivery of ordinary and commercial correspondence;
- To other subjects (companies and consultants appointed for this purpose) who provide services for auxiliary purposes to the relationship between you and CAEN SpA within the limits strictly necessary to perform tasks such as: tax compliance, accounting, information system management, financial services, credit recovery.

**Dissemination:** the data, without prejudice to the absolute prohibition of disseminating data suitable to reveal the state of health, may be disclosed to:

- Publication on the website or company social media subject to explicit

**Storage:** Your personal data will be stored in the manner indicated above, for the minimum time required by the legislative and contractual nature. At the time of the interruption of the contractual relationships between You and CAEN S.p.A., the data will be stored for 10 years on company management and / or in paper archives. At the time of cancellation it is possible that the data will still be stored but anonymized.

You have the right to obtain from the holder the cancellation, communication, updating, rectification, integration of personal data concerning you, and in general can exercise all the rights provided by the art.7 of the Privacy Code and from Chapter III of the GDPR, Articles 12 to 23, including the right to lodge a complaint with the supervisory authority.

**Anti-fraud Policy:** Authorities are reporting an increasing number of fraudulent emails sent to people in an attempt to trick them into revealing personal or financial information or asking to change payments terms or sensitive information. To help our clients not to incur in fraudulent attempts we remind that per company policy CAEN does not send unsolicited emails to customers requesting information regarding invoices, account numbers, passwords or personal information.

Any request to change the payments terms or account must be verified true a trusted channel and NOT by email.

CAEN takes all information regarding suspicious or fraudulent activities very seriously. Please inform us at [anti-fraud@caen.it](mailto:anti-fraud@caen.it), if you suspect that you have been written to or verbally approached under the improper use of the brand name "CAEN" or the company logo or if the brand name or logo of CAEN are fraudulently used in the Internet.