

Privacy Policy Statement pursuant to Regulation (EU) 2016/679 "General Data Protection Regulation (GDPR)"

Pursuant to Art. 13 of Regulation (EU) 2016/679, we inform you that Balthazar S.r.l. processes the personal data of:

- a) customers and suppliers;
- b) subjects who voluntarily provide (by telephone, on site, via fax or e-mail, etc.) their personal data to our office staff (sales and marketing, sales, etc.).

The data subject to processing are mainly personal data, e-mail addresses, phone numbers and any other data required to perform the contract that the parties have entered into. Such data will under no circumstances fall within the special categories referred to in Art. 9 of the GDPR, unless this type of data is provided voluntarily by the Data Subject (for example, by forwarding a CV).

In compliance with statutory provisions, our company ensures that personal data will be processed in accordance with fundamental rights and freedoms as well as with the dignity of the data subject (the subject to whom the processed personal data refers), especially with regard to confidentiality, personal identity and the right to the protection of personal data.

Nature of data collection:

Category a), customers and suppliers: the collection and processing of your personal data (in the case of customers, also through our sales agents, formally authorized to process such data) is necessary in order to fulfill the obligations arising from the contract and, in general, to fulfil legal obligations: failure to provide such data may make it impossible for us to fulfil the contractual agreements.

Category b), subjects who provide data voluntarily: it is not mandatory to provide your personal data, but it is necessary so that Balthazar S.r.l. can reply to your specific requests for information and services (subscription to newsletters, reservations, etc.).

Finally, providing your personal data is *optional* for the purposes of processing referred to in *paragraphs 4 and 5* below. We therefore ask you to subscribe and send back, delivered by hand through our agents, by fax, mail, e-mail, etc., the required Consent Form, which will also be available on the *Privacy* page of our website.

Purposes of processing:

1. to comply with legal obligations, regulations, Community legislation, and civil and fiscal rules;
2. to fulfil the contractual obligations towards the Data Subject;
3. to meet operational requirements linked to the business activities of our company, such as accounting, order management and related invoicing, drawing up internal statistics, etc.;
4. commercial purposes, such as sending commercial information and promotional material (by post, fax, e-mail or text message) as well as marketing material and market surveys regarding the events, products and services of Balthazar S.r.l.;
5. communication or dissemination, for commercial and promotional purposes, of information about your company (company name, headquarters, photos, events and promotional initiatives, etc.), through our communication channels (websites, social networks, company newsletter, e-mail, press releases, etc.);
6. manage requests for information and services made by the data subject;
7. credit protection and debt management.

Legal basis for data processing:

Balthazar S.r.l. will process the personal data of the Data Subjects only if one of the conditions envisaged by current legislation is met, specifically:

- a) *to fulfil a contract of which the Data Subject is a party.* This is the case of the fulfilment of purchase and sale contracts and of the management of requests made directly by the Data Subject to one of our offices (MKTG and commercial, sales, etc.);
- b) *to fulfil a legal obligation.* This is the case, for example, of the fulfilment of civil and fiscal obligations;
- c) *based on the consent of the Data Subject.* This is envisaged for the purposes set out in paragraphs 4 and 5 and, for example, in case the Data Subject should voluntarily provide his/her Curriculum Vitae so that Balthazar S.r.l. can examine his/her application;
- d) *in the legitimate interest of the Data Controller.* For example, for exercising one's rights or for defense in court.

With regard to the above mentioned purposes, your personal data will be disclosed, if necessary:

- ✓ to Public Administrations, police forces, and judicial and administrative authorities, where required by law;
- ✓ to our commercial agents, companies or the credit institutions to which our company entrusts the management of receivables/payables;
- ✓ to all natural and/or legal persons, public and/or private (legal, administrative and tax consultancy firms, judicial offices, insurance companies, etc.), to whom communication is necessary or functional to carrying out our activities, exclusively for the purposes listed above;
- ✓ for the purposes specified in paragraph 5, to (current and/or potential) customers, newspapers and business partners.

Any personal data processed by our company will be subject to disclosure exclusively in accordance with the purposes and methods set out in paragraph 5 above.

Data will be processed, with or without the aid of electronic and, in any case, automated means, by adequately instructed and formally authorized internal staff of Balthazar S.r.l.,

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as well as by any external Managers, service providers of Balthazar S.r.l., of proven expertise and reliability who will perform their duties by following the instructions provided by the Data Controller and under the latter's control. These include, for example, companies specializing in IT and telematic services, tax and auditing consultants, hardware and software maintenance companies, etc.

In any case, data will be processed in compliance with all precautionary measures that ensure its security and confidentiality.

Data retention period:

Data collected to conclude and perform contracts with the Data Subject: the data provided by you will be processed for the entire duration of the existing contractual agreement in place between us and will be retained exclusively for the time required to fulfil related statutory and legislative obligations, unless further retention is necessary to defend or assert a right, or to comply with any additional legal obligations or orders from Public Authorities.

Data collected during the use of services or related to requests made by the Data Subject: such data will be retained for the time necessary to fulfil the request or to terminate the service;

Data provided for commercial and promotional communication activities: until the Data Subject requests that the activity be interrupted or, in any case, within 2 years from consent or from the last interaction, of any kind, of the user with Balthazar S.r.l.

Curriculum Vitae: within six months of receipt.

Rights of the Data Subject:

The GDPR entitles the **Data Subject** to exercise specific **rights**. Specifically, you may ask Balthazar S.r.l. for:

access (Art. 15 GDPR): you may request confirmation whether or not data concerning you is being processed as well as further clarification on the information contained in this Privacy Policy;

rectification (Art. 16 GDPR): you may request to rectify or supplement the data you have provided us with or otherwise in our possession, if inaccurate;

erasure (Art. 17 GDPR): you may request that your data acquired or processed by Balthazar S.r.l. be erased, if no longer necessary for our purposes or, if there are no existing claims or disputes, if you withdraw your consent or object to their processing; in the event of unlawful processing or if there is a legal obligation to erase the data;

restriction (Art. 18 GDPR): you may request a restriction on the processing of your personal data when one of the conditions set out in Art. 18 of the GDPR is met;

object (Art. 21 GDPR): you may object to the processing of your data at any time on the basis of a legitimate interest on our part, unless we have legitimate reasons for processing your data that prevail over yours, for example for exercising our rights or defending ourselves in court;

portability (Art. 20 GDPR): you can ask to receive your data, or have it transmitted to another data controller specified by you, in a structured, commonly used and machine-readable format.

In addition, pursuant to Art. 7, paragraph 3 of the GDPR, we inform you that you may exercise your right to withdraw your consent at any time, without affecting the lawfulness of processing based on prior consent. We also inform you that you have the right to lodge a complaint with the Supervisory Authority which, in Italy, is the Data Protection Authority.

In order to exercise these rights, you may contact the Data Controller, Balthazar S.r.l., Contrada Cerza Grossa, Sorbo Serpico (AV), ITALY Tel. +39 0825986611 - Fax 0825986230 - E-mail: privacy@mareнна.it