

## **DISCLOSURE UNDER ART. 13 OF THE GDPR REGARDING THE PROCESSING OF PERSONAL DATA CUSTOMERS AND PROVIDERS**

### **1. Data controller**

CAURUM S.r.l., with registered office in Arezzo (AR), Frazione San Zeno, Strada A 36, telephone no. 0575 99494, fax no.0575 959190, e-mail info@caurum.it, (hereinafter, the “Controller” or the “Company”), hereby informs you that the Regulation EU no. 2016/679 of 27 April 2016 (so-called “GDPR”) and the Legislative Decree 196/2003 as amended, regulate personal data protection. CAURUM S.r.l. grounds the processing of personal data on lawfulness, fairness, transparency and necessity principles, as provided for by the aforesaid regulations. As Controller of the personal data collected for the purposes of the negotiation and possible conclusion of the agreement for the provision of goods and/or services (the “Agreement”), CAURUM S.r.l. provides the following information.

### **2. Categories of processed data**

On the negotiation of the contractual terms and in the performance of the Agreement, the Controller will collect or may become aware of the following personal data referred to you. These data include, but are not limited to, name and last name, corporate name, tax code, VAT number, registered office and/or residence or domicile, IBAN, telephone number (the “Personal Data”).

### **3. Purposes and legal basis for processing**

The processing of the Personal Data, gathered from the data subject, takes place for the following purposes:

- a) purposes strictly connected and instrumental to the establishment and/or management of a contractual relationship (including, but not limited to, evaluation of new providers and customers);
- b) carrying out the administrative and management activity, in compliance with the accounting, tax and any other obligations laid down by the applicable legislation;
- c) where necessary to exercise the rights of the Controller, e.g. the right of defence in court or in case of litigation.

In accordance with art. 6 para. 1, sub-paragraphs b) and c) of the GDPR, the legal basis for the processing operations performed for the purposes referred to in this paragraph (sub-paragraphs a and b above) is given by the performance of the Contract to which the data subject is party or in order to take steps prior to entering into the Contract and by the compliance with legal obligations and any applicable authorization adopted by the Data Protection Authority. According to art. 6 para. 1 sub-para f) of the GDPR, the legal basis for the processing performed for the purposes referred to in this paragraph (sub-paragraph c above) is given by the legitimate interest pursued by the Controller aimed at protecting its right of defence.

### **4. Nature of data provision and consequences of any refusal to provide data**

The provision of the Personal Data is necessary for the achievement of the purposes mentioned in paragraph 3 above. Any refusal to provide said data would prevent the Controller from establishing and/or carrying on any contractual relationship.

### **5. Methods and place of processing**

The processing of the Personal Data may consist in their collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure, alignment or combination, restriction, erasure or destruction, as provided for by art. 4 no. 2) of the GDPR. It may be performed in both paper form and electronic and telematic form, in a manner and with instruments that ensure appropriate security and confidentiality of the data themselves. More specifically, any suitable technical and organisational measure to protect the data will be implemented in order to satisfy the applicable legal requirements and protect the rights of the data subjects.

Processing operations will be performed at the registered office of CAURUM S.r.l., frazione San Zeno, Strada A n. 36 – 52100 Arezzo (AR).

## 6. Disclosure of data

The Personal Data will not be disclosed; however, for the purposes referred to in paragraph 3, they may be disclosed to third parties, including parent company, agents, consultants and professionals, banks and credit institutions, insurance companies, financial companies, service companies, credit management and recovery companies, companies that perform maintenance on our information systems, public bodies, auditing or supervisory bodies, in order to comply with legal obligations, regulations, EU legislation or for aspects concerning the management and performance of the legal relationship with you.

The Personal Data will be processed by the following entities:

- Company's employees/consultants acting as entities authorised by the Controller according to their duties and properly instructed;
- Data processors pursuant to art. 28 of the GDPR, whose list is available at the registered office of CAURUM S.r.l.

## 7. Transfer of personal data to Third Countries

The Personal Data will be handled and stored in Europe, on the Controller's servers, located in Italy.

## 8. Period for which data are stored

The Personal Data will be stored for the time strictly necessary to the performance of the contractual relationship and however throughout the term thereof, without prejudice, however, to the storage of data which would become necessary under the regulatory provisions in force from time to time. At the end of the contractual relationship, the Controller will store the Personal Data in compliance with specific legal obligations laid down by the applicable regulations. For any request for clarification, please send an email to [info@caurum.it](mailto:info@caurum.it).

## 9. Rights of the data subject

Without prejudice to any specific and mandatory legal obligations and where the legal grounds apply, in relation to your Personal Data, all the rights under articles 15, 16, 17, 18, 20 e 21 of the GDPR may apply and more specifically:

- a) right to access the personal data, in order to obtain from the Controller confirmation as to whether or not personal data concerning you are being processed and, where that is the case, request to access the personal data processed by the Controller and obtain a copy of such data and the other information about processing (art. 15 GDPR);
- b) rectification or completion of the incomplete or inaccurate personal data kept by the Controller (art. 16 GDPR);
- c) data erasure. There are cases, however, in which the Controller may refuse to meet a request for erasure, i.e. if the Personal Data are necessary to comply with a legal obligation or for the defence of legal claims (art 17 GDPR);
- d) restriction of processing (art. 18 GDPR);
- e) right to data portability, i.e. the right to receive the data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance (Art. 20 GDPR);
- f) right to object to processing (art. 21 GDPR).

Furthermore, the data subject will have the right to lodge a complaint with the competent Supervisory Authority pursuant to art. 77 of the GDPR.

For any clarification regarding this disclosure or any privacy issue or if the data subject wishes to exercise the rights under this paragraph 9, you may send an email to [info@caurum.it](mailto:info@caurum.it)

#### **10. Right to lodge a complaint**

Regarding any type of data processed by the Controller, the data subject has the right to lodge a complaint with the Data Protection Authority via the website [www.garanteprivacy.it](http://www.garanteprivacy.it), where he/she believes that the processing of his/her data is contrary to the regulatory provisions in force from time to time.

CAURUM S.r.l. will constantly update the disclosures of all data subjects and make them available on the website [www.caurum.it](http://www.caurum.it).

Arezzo, 20 January 2021