

## CUSTOMERS PRIVACY NOTICE

### -Customers-

**REAL COMM S.R.L.**, headquartered in 33080 Porcia (PN), via dei Serviti 12, in the person of its legal representative pro tempore, Italian VAT nr. 01410160939, in its capacity of controller (hereinafter **Controller**), hereby provides you – according to art. 13 and, where necessary, art. 14 of EU Regulation nr. 679/2016 (hereinafter also **GDPR**) on the protection of personal data, and of D.Lgs 196/2003 as amended by D.Lgs 101/2018 (hereinafter also **Privacy Code**) – with the following information:

#### 1.0 REFERENCE FIGURE.

According to art. 37 GDPR the Controller has appointed the law firm Avv. Antonella D’Olivo as Data Protection Officer (hereinafter also **DPO**) who may be contacted for any matter relating to the processing of personal data of data subjects at the following addresses: 33080 Porcia (PN), via dei Serviti 12; tel: +39 0434-1831550; dpo@realcomm.it.

#### 2.0 CATEGORY AND SOURCE OF THE DATA PROCESSED.

The personal data held by the Controller are collected directly from You as a client (hereinafter also **Data Subject**), through its employees and/or agents. The Controller processes your common personal data (such as: first name, last name, company name, address, telephone number, email address, bank and payment details – hereinafter **personal data** or simply **data**) provided by You at the time of the conclusion of the contract(s) and during their execution.

#### 3.0 LEGAL BASIS AND PURPOSES OF PROCESSING.

Your personal data are processed:

**A)** Without Your express consent (art. 6 lett. B, C, F, GDPR), for purposes related to:

- the establishment and management of the contractual relationship and the provision of Services;
- to compliance with legal obligations related to civil, tax, accounting regulations, etc.;
- to administrative management;
- to fulfilment of contractual obligations;
- to technical support, updates, and technical information regarding the services provided;

to credit risk protection (such as the acquisition of preliminary information prior to the conclusion of the contractual relationship and the execution of operations based on the obligations arising from the contractual relationship itself).

**B)** only with Your specific and separate consent (ex art. 6 lett. A and art. 7 GDPR), expressed at the bottom of this notice, for the following purposes sending informational material and updates on initiatives and offers of our company via email.

#### 4.0 NATURE OF THE PROCESSING AND CONSEQUENCES OF THE REFUSAL TO REPLY.

Sharing your data for the purposes stated in paragraph 3.0 A) is necessary; therefore, any refusal to provide such data may result in the Controller being unable to establish the contractual relationship and provide the requested service. The provision of data for the purposes referred to in paragraph 3.0 B) is optional. You may therefore choose not to provide any data or to subsequently deny consent to the processing of data already provided: in such case, you will not receive further information regarding updates on our Services. However, you will still be entitled to receive the Services referred to in paragraph 3.0 A).

#### 5.0 MODALITIES OF THE PROCESSING AND ACCESS TO DATA.

To the extent of the declared purposes, the processing of the data occurs by manual, IT, and electronic tools, with procedures strictly related to the purposes themselves and, in any case, in a manner that ensures, with the support of appropriate technical measures, the security and confidentiality of the data. Access to data is granted only to authorised personnel, who are adequately instructed and informed about their tasks and the allowed processing of the collected data.

#### 6.0 SCOPE OF DATA SHARING AND POSSIBLE DISCLOSURE.

Your data may, for the above-mentioned purposes, be communicated to the Real Comm S.r.l. sales network (agents, dealers, distributors), to our subcontractors and sub-suppliers when involved in the execution of our orders, and to individuals, companies, associations or professional firms that provide assistance and consultancy services to our Company, duly appointed, where required by law, as External Data Processors ex art. 28 GDPR, and the names of such entities may be verified upon request by the data subjects by sending a communication using the methods indicated in paragraph 9.0 below. Your data may also be communicated to the DPO and to third-party entities such as banks, data processing centres, credit information agencies, and debt collection companies that perform commercial and credit-related information activities. Your data will not be transferred outside the European Union. Your data will not be disclosed.

## 7.0 STORAGE OF PERSONAL DATA.

The Controller shall retain the data for a period no longer than necessary for the achievement of the purposes for which the data were collected; therefore, they will be retained for the duration of the existing contractual relationship. Data strictly necessary for tax and accounting obligations, once the purpose referred to in point 3.0 A) has ceased, will be retained for 10 years or for a different period as required by applicable laws. Data collected for the purposes referred to in point 3.0 B) will be processed for no more than 2 years from the time of collection, unless consent is withdrawn.

## 8.0 RIGHTS OF DATA SUBJECT.

According to articles 15 to 22, and 77 GDPR you may exercise:

**I.** the right of access to data (art. 15); **II.** the right to lodge a complaint with the Data Protection Authority (art. 15 and 77); **III.** the right to rectification (art. 16); **IV.** the right to erasure (erasure art. 17); **V.** the right to restriction of processing (art. 18); **VI.** the right to obtain from the Controller notification to recipients to whom the data have been disclosed of any rectification or erasure or restriction of processing (art. 19); **VII.** the right to data portability (art. 20); **VIII.** the right to object (art. 21); **IX the right to refuse automated processing** (art. 22); **X.** the right to withdraw consent to processing, if given, freely and at any time, with regard to data processed based on consent. Withdrawal shall not affect the lawfulness of processing based on consent before its withdrawal (art. 7, comma III).

In this way, you may access your data to: • Verify their accuracy; • Modify them if they become inaccurate; • Supplement them with an additional statement; • Request their erasure; • Restrict their processing; • Object to processing.

## 9.0 HOW TO EXERCISE RIGHTS.

All the rights referred to in the previous article 8.0 may be exercised by the data subject by sending a registered letter or an email addressed to Real Comm S.r.l. at the following addresses: via dei Serviti n. 12, 33080 Porcia -PN-; e-mail: [privacy@realcomm.it](mailto:privacy@realcomm.it) or [dpo@realcomm.it](mailto:dpo@realcomm.it).

## EXPRESSION AND ACQUISITION OF CONSENT FOR FURTHER PROCESSING NOT ESSENTIAL FOR THE CONTINUATION OF THE RELATIONSHIP.

The data subject, in relation to:

- the processing of his/her common personal data for the purpose of sending, via email, informational material and updates on initiatives and offers of Real Comm S.r.l., as indicated in point 3.0 B):

**Denies Consent**

☐

**Gives Consent**

☐

Date \_\_\_\_\_

Name and surname / Company name of the client

\_\_\_\_\_

Legible signature of the client

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