

Innovative TPU, PVC solutions and related high-frequency electro-welding

Form ICONT – Date Updated 02/2022

Information on the processing of personal data

Pursuant to Art. No. 13 of the EUROPEAN REGULATION No. 679/2016

To all Interested Parties

ESSAY GROUP srl as the Data Controller in accordance with Article No. 13 of the European Regulation No. 679/2016 "General Data Protection Regulation (GDPR)" (hereinafter EU Regulation), laying down provisions on the processing of personal data, wishes to inform you about the processing of your personal data.

The rule stipulates that anyone who processes personal data is required to inform the data subject about the data processed and the qualifying elements of the processing, which must in all cases be carried out in a lawful, fair and transparent manner, as well as protect the confidentiality and guarantee the rights of the data subject.

It should be noted that data processing means any operation or set of operations concerning the collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, and destruction of data.

1.Data Controller

The Data Controller is Essay Group srl, based in Via Gazzo 33 – 35035 Mestrino (PD), Tax Code and VAT No. 04579340284, contactable at the following: phone +39 049 9004134, e-mail: info@essaygroup.it.

2. Nature of Data Processed, Purpose and Legal Basis for Processing

Nature of data processed. In relation to the purposes of processing below, we inform you that only "common personal data" will be processed, such as:

- Company identification data (company name, VAT number, tax code, type, address, telephone no, e-mail, etc.);
- company contact details, contact person and legal manager (first name, last name, etc.);
- etc.

Purpose of processing. Your personal data will be processed for the following purposes:

- A. give feedback on your requests: by filling out, voluntarily, the appropriate form found in this contact area;
- B. fulfilling legal obligations;
- C. Communication of your personal data to Companies connected or related to the undersigned, as well as to Partner Companies of the undersigned for their marketing purposes: to send you advertising material, direct sales, fulfillment of market research and commercial and promotional communications;
For brevity, the detailed list of these Companies is available at the office of the Data Controller and is at your disposal.

Legal basis of processing. Personal data, for the purposes mentioned in 2A and 2B will be lawfully processed to fulfill pre-contractual and contractual obligations between us and user (art.6, section 1 lett. b), to fulfill our legal obligations (art.6 section 1 lett. c).

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Your personal data, for the purposes referred to in point 2C of this notice may be lawfully processed only with your consent (art. 6. section 1 lett. a EU Regulation), which is specific, separate, express, documented, prior and entirely optional.

The consent you have given may be revoked at any time, without affecting the lawfulness of the processing based on the consent given before revocation (art.7 section 3 EU Regulation)

3. Recipients of the data and Method of processing

The processing of your personal data will be based on the principles of correctness, lawfulness and transparency and may be carried out by means of paper and electronic instruments both by the staff of the undersigned Company, authorized/charged with the processing of personal data, and by external parties called upon to carry out specific tasks, on behalf of the Data Controller, as Data Processors, pursuant to Art. 28 EU Regulation, subject to our letter of assignment imposing on them the duty of confidentiality and security of the processing of personal data, and the adoption of appropriate security measures to prevent data loss, illicit and incorrect use, and unauthorized access, in compliance with current provisions on the protection of personal data.

For brevity, the detailed list of these figures is available at the office of the Data Controller and is at your disposal.

Your personal data will not be disseminated and will not be transferred to third countries or international organizations, will not be disclosed to third parties except for legal or contractual obligations

4. Data storage period

Your personal data will be retained for a period of time not exceeding the achievement of the purposes for which they are processed, in accordance with the principle of retention limitation provided for in the EU Regulation and/or for the time necessary for legal and contractual obligations or until the data subject withdraws the specific consent and, therefore,

- with reference to the purposes indicated in points 2A-2B, the data will be retained for the time not exceeding the achievement of the purposes for which they are processed and/or for the time strictly necessary for the fulfillment of legal and contractual obligations;

As a guarantee of the stated retention times, a periodic audit is to be carried out annually on the data processed and whether it can be deleted if it is no longer needed for the intended purposes.

5. Consequences of failure to report data

The personal data in items 2A-2B of this policy are necessary, without such data it would be impossible for us to proceed with registration (creation of your personal account), fulfill contractual and legal obligations.

Personal data, on the other hand, referred to in point 2C are optional refusal to provide them will not result in any consequences and will not affect your request to proceed with registration as well as to perform your contractual and legal obligations. It can then decide not to give any data or later deny at any time the possibility of processing data already provided.

6. Rights of the interested party

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In your capacity as a data subject, you have the rights set forth in Articles No. 15 to 22 of the EU Regulation below, namely, you have the right to:

- obtain confirmation of the existence and processing of personal data, and if so, obtain access to data (so-called right of access);
- obtain information about the purposes of the processing, the categories of data concerned, the recipients or categories of recipients to whom the data have been or will be disclosed, particularly if recipients in third countries or international organizations, the expected data retention period or the criteria used to determine this period; and where the data are not collected from the data subject, obtain all available information about their origin;
- obtain the rectification of personal data (so-called right of rectification)
- obtain the deletion of personal data (so-called right to be forgotten);
- obtain limitations on processing (so-called right to limitation of processing);
- obtain portability of data, i.e., receive them from a data controller in a structured, commonly used, machine-readable format and transmit them to another data controller without impediments (so-called right to data portability);
- object to the processing at any time (so-called right to object). We specifically inform you, as required by Article 21 of the EU Regulation, that where personal data are processed for direct marketing purposes (including profiling), the data subject has the right to object at any time to the processing of personal data carried out for such purposes, and that if the data subject objects to the processing for direct marketing purposes, the personal data may no longer be processed for such purposes;
- to be made aware (with an opportunity to object) of the existence of automated decision-making regarding individuals, including profiling;
- revoke consent at any time without affecting the lawfulness of processing based on the consent given before revocation;
- Propose a complaint to a supervisory authority (Data Protection Authority).

Please note that there may be conditions or limitations on the rights of the data subject. Therefore, it is not certain that, for example, one has the right to data portability in all cases, this depends on the specific circumstances of the processing activity.

Another example: in case you decide to object to the processing of your data, the Data Controller has the right to evaluate your application, which may not be accepted if there are compelling legitimate grounds for processing that override your interests, rights and freedoms.

7. Ways of exercising rights

Without any formality you may at any time exercise your rights clearly and explicitly by sending:

- a registered letter with return receipt to the undersigned
- an e-mail to info@essaygroup.it.

Or by contacting the Data Controller directly at: +39 049 9004134.

8. Minors

What is offered by the Data Controller and the subject of the existing relationship with you does not involve the intentional acquisition of personal information referring to minors. In the event that information about minors is unintentionally recorded, the Data Controller will delete it in a timely manner upon request or notification by the data subject.

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9. Appointees/Authorized Persons – Data Processors

Below we provide you with some information that it is necessary to bring to your attention, not only in order to comply with the obligations of the Law, but also because transparency and fairness towards the interested parties is a founding part of our activity.

Appointees/Authorized Persons. An up-to-date list of the Appointees/Authorized Processors is kept at the Data Controller's office.

Data Processors.

For brevity, the detailed list of these figures is available from our office.