

# CREOM<sup>®</sup> S.r.l.

Via del Parlamento Europeo 21/C 50018 Scandicci (Firenze)

## **Regulation according to Articles 13-14 of GDPR (GENERAL DATA PROTECTION REGULATION) 2016/679 CUSTOMERS**

Creom s.r.l. is a company located in 50018 Scandicci via del Parlamento Europeo 21/C, tax code and VAT number: IT06255740489 (now called "Controller"), as Controller of the processing, according to Article 13 D.Lgs. 30.6.2003 no. 196 (now called "Privacy Code") and Article 13 EU Regulation no. 2016/679 (now called "GDPR") informs you that your data will be processed following principles of honesty, lawfulness and transparency in order to protect them. Your data will be processed for the following aims and with the following methods:

### **1. Object of the processing**

The Controller keeps personal data, which can identify you, (such as name, surname, name of the company, address, telephone number, e-mail, bank co-ordinates and method of payment) – now named "personal data" or simply "data", communicated by you in occasion of the conclusion of a contract for the Controller's services.

### **2. Aim of the processing**

Your personal data are used:

- A) Without your explicit consent (article 24, a), b), c) Privacy Code and article 6, B) e) GDPR), in order to:
  - Conclude contracts for the Controller's services;
  - Fulfil pre-contractual, contractual and fiscal obligation that exist with you;
  - Fulfil obligations foreseen from Law, from a regulation, from the European norm or from an Authority order (such as anti-money – laundering);
  - Practise the Controller's rights. For example, the right of defense in a trial;
  
- B) Only with your previous and explicit consent (article 23 and 130 Privacy Code and article 7 GDPR), for the following aims of marketing:
  - Sending commercial communications and/or advertising of products or services offered by the Controller and surveys on quality satisfaction through e-mail, postal service, SMS, telephone contacts, newsletter.
  - Sending commercial and/or promotional communications of third-parties (such as business partner, insurance companies and other companies of the group).

We underline that if you already are our customer, unless you deny the consent, we may send you commercial communication related to services and Controller's products similar to those you are using (article 130 paragraph 4 Privacy Code).

### **3. Method of processing**

Your personal data processing is executed through operations listed in article 4 Privacy Code and article 4 and 2) GDPR. To be clearer: collection, registration, organisation, conservation, consultation, processing, modification, selection, extraction, comparison, usage, interconnection, lock, communication, erasure and destruction of data. Your personal data are submitted to both paper and electronic/automatized processing.

The Controller will process your personal data the time needed to fulfil the aims listed above, but not more than 10 years from the cessation of the relationship for the Aim of Service and not more than 2 years from the collection of data for the Aim of Marketing.

#### **4. Access to data**

Your data will be accessible for the aims of Articles 2.A) and 2.B):

- To the employees and collaborators of the Controller, as charged and/or internal people charged of the processing and/or system administrators;
- To third-party companies or other subjects (for instance credit institutes, professional studies, consultants, insurance companies that offer insurance services, etc.), which do outsourcing activities for the Controller as external responsible of the processing.

#### **5. Data communication**

Without asking an explicit consent (ex-article 24, a), b), d) Privacy Code and article 6, B) and c) GDPR), the Controller could communicate your data for the aims of article 2.A) to vigilance organisms (such as IVASS) to the judicial Authority, to insurance companies for their services and to those subjects too, whose communication is required from Law to complete the aims listed above.

These subjects will treat data as autonomous Controller of the processing.

Your data will not be diffused.

#### **6. Data transfer**

Personal data are kept:

- In locked archives in the rooms of the Controller's headquarter (Italy) if you have filled a paper form;
- On the server NAS (Network Attached Storage) in the Controller's headquarter. The Controller and the employees can access using a username and password, if you filled an online form or if you have digital data.

Your personal data will not be transferred out of the European Union.

#### **7. Security**

The Controller adopted a lot of security measures to protect your data from the loss, abuse and alteration risk. Particularly, the Controller adopted the technology of data encryption; measures used according to articles 32-34 Privacy Code and article 32 GDPR in case of surer communications.

#### **8. Nature of data assignment and consequences of refuse of answering**

You have to confer your data for the aims of article 2.A). Without them, we could not guarantee services of article 2.A).

Conferring your data for the aims of article 2.B) is an option, instead. It is possible to decide whether confer data or not. It is possible, also later, denying the possibility of processing data already given: in this case, you will not receive newsletters, commercial communications and advertising related to services offered by the Controller.

However, you will benefit of the services offered by article 2.A).

## 9. Rights of the interested party

According to article 7 Privacy Code and article 15 GDPR, the interested party has the right to:

- 1) Obtain the confirmation of your personal data existence even if not yet registered, and their communication in an intelligible way;
- 2) Obtain indication of:
  - a) Personal data origin;
  - b) Aims and modalities of processing;
  - c) Logic applied in case of executed processing through electronical instruments;
  - d) Identification of the Controller, employees and representatives designated according to article 5 paragraph 2 Privacy Code and article 3 paragraph 1, GDPR;
  - e) Subjects or categories of subjects to whom personal data can be communicated or learned by designated representatives of the State, employees or people in charge.
- 3) Obtain:
  - a) Upgrades, rectification and, in case of interest, integration of data;
  - b) Erasure, transformation in anonymous form or block of data for violation of the law, included those data, whose conservation is not necessary for the aims data were collected or later treated.
  - c) Declaration that operations listed in points a) and b) are brought to awareness, even for their contents, of those, whose data were communicated or diffused, except for the case where the fulfilment is impossible or it needs an employment of means completely disproportioned respect to the protected right;
- 4) Put up opposition to:
  - a) the processing of personal data for legitimate reasons, if pertinent to the aim of the collecting;
  - b) the personal data processing with the aim of sending advertising, direct selling or for marketing through the usage of automatized systems of calling without the intervention of the operator, through e-mail and/or through traditional marketing techniques through telephone and/or postal service. We underline that the right of opposition of the interested, exposed previously in point b), for aims of direct marketing through automatized methods, involves also the traditional ones. There is the possibility, for the interested, to exercise the right of opposition even only partially. For these reasons, the interested can decide to receive communications only through traditional method. In other words, only automatized communications or neither of the two types of them.

Where it is possible to apply them, there are also rights according to the Articles 16-21 GDPR (right of correction, right of oblivion, right of limitation of processing, right of data portability, right of opposition), and the right of reclaim to the guarantee authority.

## 10. Method of exercise of rights

You could at any time exercise your rights sending:

- A registered letter to CREOM® s.r.l. located in 50018 Scandicci (Florence), Via del Parlamento Europeo, 21/C;
- An e-mail to the address: [amministrazione@creom.it](mailto:amministrazione@creom.it).

### **11. Controller, responsible and people in charge**

The Controller of the processing is CREOM® s.r.l., located in via del Parlamento Europeo 21/C, 50018 Scandicci (Florence).

The upgraded list of people in charge of the processing is protected in the headquarter of the Controller of the processing.

### **12. Data Protector Officer**

Lawyer Bruno Francesco Tallarico  
Via Roma 194 Scandicci (FI)