

INFORMATION ON THE PROCESSING OF PERSONAL DATA RELATED TO THE RELATIONSHIP WITH CUSTOMERS AND POTENTIAL CUSTOMERS

The following information is intended for natural persons, including professionals, sole proprietors and representatives/referents of companies, bodies, associations and foundations, hereinafter referred to as "Data Subjects".

Identity and contact information for the Data Controller

Panotec Srl with registered office in Cimadolmo (TV), Via Polese 2, Italian Tax Code and VAT no. 02462930260, E.A.I. no. 211673 privacy@panotec.it.

Purposes and legal basis

- A. Management of the pre-contractual phase:** personal data are processed for all needs related to the processing of requests for information and/or quotes.
- B. Collection of business information:** personal data are processed to collect information to verify the economic, financial and asset situation of the Data Subjects, as well as their solidity, solvency and reliability.
- C. Management of the contractual phase:** personal data are processed for all needs related to the management of the contractual relationship in all its phases (e.g. management of appointments, organisation of logistics, management of customer support activities and fulfilment of regulatory obligations incumbent on the Data Controller).
- D. Soft Spam:** the e-mail address provided under the contract is used to promote products or services similar to those already sold or provided respectively.
- E. Marketing:** contact details are used to send advertising or direct sales material, to carry out opinion and satisfaction surveys, to send commercial communications containing information on its products or services, as well as promotions or invitations to events in which the Data Controller will participate.
- F. Profiling:** the data are processed to analyse behaviours, habits and propensities to consume in order to meet specific needs and improve the products and services offered by the Data Controller. In particular.
- G. Communication to third parties for Marketing purposes:** the data are transmitted to third parties who, as independent data controllers, will process them for their own marketing purposes.
- H. Defensive purposes:** the Data Controller may need to process personal data for the management of out-of-court or in-court disputes and litigations.

Purpose	Legal basis (common data)	Legal basis (special data)
A.	Execution of pre-contractual measures.	/
B.	Legitimate interest of the Data Controller connected to the analysis and definition of business strategies and policies, to the identification of subjects suitable for the initiation or continuation of commercial relations and to the methods and conditions of payment and to the fight against fraud.	/
C.	Execution of the contract; Fulfilment of legal obligations.	/
D.	Legitimate interest required by law.	/
E.	Consent.	/
F.	Consent.	/
G.	Consent.	/
H.	Legitimate interest of the Data Controller to ascertain, exercise or defend a right.	To ascertain, exercise or defend a right.

Storage period

Purpose	Storage time
A.	Time required to process incoming requests and subsequent correspondence (usually 24 months from the last communication).
B.	Time required for the checks to be carried out.
C.	10 years from the termination of the contract.
D.	24 months from the last purchase.
E.	-

F.	12 months from the recording of the data.
G.	12 months from the collection of consent.
H.	10 years from the final resolution of the dispute.

Nature of the provision and consequences of refusal

Purpose	Nature	Consequences
A.	Necessary	Inability to receive the requested information.
B.	Not applicable	/
C.	Necessary	Inability to start or continue the business relationship.
D.	Optional	Inability to receive promotional communications relating to products or services to those already sold or provided.
E.	Optional	-
F.	Optional	Inability to receive communications / read personalised ads
G.	Optional	Inability to transmit the data to third parties for their own marketing activity.
H.	Necessary	Inability to manage the litigation.

Area of communication

The data are processed by internal personnel authorised for specific tasks and are communicated externally pursuant to the following rules

Purpose	Categories of external recipients
A.	Companies belonging to the same business group, agents, commercial consultants, retailers, business brokers, sales force in general.
B.	Companies belonging to the same business group, trade information companies, agents, credit recovery companies, sales agencies/agents, accounting firms, auditing firms and board of statutory auditors, insurance companies, insurance brokers (trade credit policy), law firms for insolvency management.
C.	Companies belonging to the same business group, trade information companies, agents, credit recovery companies, sales agencies/agents, accounting firms, auditing firms and board of statutory auditors, insurance companies, insurance brokers (trade credit policy), law firms for insolvency management.
D.	Companies belonging to the same business group, consultancy companies in the marketing field, companies that offer hosting/management services for technological platforms.
E.	Companies belonging to the same business group, consultancy companies in the marketing field, companies that offer hosting/management services for technological platforms.
F.	Companies belonging to the same business group, consultancy companies in the marketing field, companies that offer hosting/management services for technological platforms.
G.	Local retailer.
H.	Law firms; credit recovery or assignment companies; judicial authorities, alternative dispute resolution bodies, insurance brokers, auditing firm and board of statutory auditors, insurance companies.

Since the data is also processed with computer tools, it could also be visible to the subjects who carry out assistance/maintenance on these systems.

Transfer of data to another country or international organisation

The Data Controller may need to carry out transfers in the context of relationships with business partners established outside the European Economic Area, as well as due to the use of IT services (cloud, backup, etc.): in all these cases, transfers will be carried out in compliance with the specific provisions established by the regulations regarding the protection of personal data, using, where not otherwise possible, standard contractual clauses.

Rights of the Data Subjects

The Data Subject to which the personal data refers has the following rights:

Access: you can find out if your personal data is being processed and if so, obtain access to it and request a copy.

Correction: you can request the updating of your personal data, its correction (if incorrect) and the integration of incomplete data.

Deletion: you can obtain the deletion of your personal data on certain conditions (for more information contact the Data Controller).

Limitation: it is possible to request that the data be marked, so as to limit its processing in the future, when certain conditions are met (for more information contact the Data Controller).

Objection: it is possible to object to the processing of personal data, for reasons related to your particular situation, where the processing is based on legitimate interest or is necessary for the performance of a task in

the public interest or connected to the exercise of public powers vested in the Data Controller; it is also possible to object to the processing of personal data for direct marketing purposes.

Portability: it is possible to receive in a structured format the personal data provided to the Data Controller and request to transmit them to another data controller if the processing is based on consent or contract and is carried out by automated means.

Revocation of consent: consent may be withdrawn for the purposes for which it was requested, without prejudice to the lawfulness of the processing carried out until such time.

The specific rights that can be exercised with respect to the processing activities performed are:

Purpose	Right exercisable						
	Access	Correction	Cancellation	Limitations	Objection	Portability	Revoke consent
A.	X	X	X	X			
B.	X	X	X	X	X		
C.	X	X	X	X		X	
D.	X	X	X	X	X		
E.	X	X	X	X		X	X
F.	X	X	X	X		X	X
G.	X	X	X	X		X	X
H.	X	X	X	X	X		

To exercise the aforementioned rights, you can use the form available at the link <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and forward it to the following e-mail: privacy@panotec.it. The data subject may request more details from the same contact in relation to the aforementioned information (e.g. legitimate interest balancing test or the list of data processors).

To object to the processing of data for the "soft spam" purpose, send an e-mail to privacy@panotec.it.

It is possible to lodge a complaint with a supervisory authority: for Italy, the Italian Data Protection Authority (www.garanteprivacy.it).