



NOTICE

pursuant to and in accordance with article 13 of EU Regulation 27 April 2016 no. 679 "General Data Protection Regulation"

OPAC S.r.l. communicates that, for the establishment and the management of the current agreement, it is the Controller of your personal data within the meaning of EU Regulation 2016/679 in the matter of protection of the personal data.

Data processing aims and lawfulness

Collection and processing of personal data is made:

1. for administrative and operational management of the tasks subject of the agreement;
2. for tax obligations and for communications to the financial authority;
3. for the fulfilment of legal and contractual obligations related to the agreement;
4. to send technical material and/or precontractual technical and economic proposals at the request of the data subject.

and data will be processed based on the principles of correctness, lawfulness, transparency, and protection of your privacy and your rights. Your personal data will be processed for the entire period of the agreement and also subsequently, for the completion of all legal obligations.

The personal data that the Data Controller may collect are the following:

- a) general data (surname, name, address, phone number, email address) of the legal representative/corporate contact;

The lawfulness of the processing is based on:

- execution of the obligations arising from a collaboration agreement (within the meaning of Article 6.1, b) of the GDPR);
- fulfilment of obligations provided for by the law (ex art. 6.1 (c) of the GDPR).

Processing methods

The processing of data for the purposes described takes place using both automated methods, on electronic or magnetic media, and non-automated methods, on paper, in compliance with the rules of confidentiality and security provided for by the law, by the ensuing regulations and internal provisions.

The data is always processed in full compliance with the principle of proportionality of the processing on the basis of which all the personal data and the various processing methods must be relevant and not excessive in relation to the aims pursued.



Stored data is protected by suitable safety measures, so as to reduce the risk of accidental loss or unauthorized access or processing not allowed or not complying with the stated purposes.

Place of processing

Data is processed and stored at the premises of Via Bruino 26 in Rivalta di Torino (TO). It is also processed, on behalf of the Company, by professionals and/or companies responsible for carrying out technical, development, business and administrative-accounting activities.

Mandatory nature of the provision of the data and consequences of a possible refusal to provide it

The provision of the data is mandatory for all that is required to fulfil legal and contractual obligations and therefore, the possible refusal to provide it in whole or in part may give rise to the impossibility for **OPAC S.r.l.** to execute the agreement or to properly fulfil all legal obligations related to the contractual relationship.

Data communication

Notwithstanding the communications made to fulfil the law and contractual obligations, all the data collected and processed can be communicated only for the purposes specified above to:

- public entities (INPS, INAIL, Provincial Employment Office, tax offices, Revenue Agency...);
- insurance companies and credit institutions.

In addition, in managing your data, persons authorised to the processing and/or external processors identified in writing and to which specific written instructions were given, may become aware of the same:

- employees and/or collaborators of OPAC S.r.l.;
- professionals or business administration services companies that operate on behalf of our company.

Transfer of data abroad

The transfer of personal data to countries outside the EU is not provided for.

Data retention times:

The data provided will be kept in our archives according to the following parameters:

- 10 years from the end of the contractual relationship, without prejudice to any obligations arising from the applicable regulation on personal data;
- 12 months after the expiry of the period of validity for particular types of documents (e.g. DURC, personal data, ...).

At the end of the processing, the data is deleted from the electronic archives and, regarding paper documents, they are destroyed by means of appropriate instruments to ensure the effective destruction of the document.



Rights of the data subject

With regard to the personal data, the data subject may exercise the rights provided for in Chapter III of the EU Reg. 2016/679 (which is enclosed), within the limits and under the conditions laid down in Articles 15 - 23 of the abovementioned Regulation. In particular, **OPAC S.r.l.** guarantees and recognizes to the data subjects the exercise of the following rights:

- the right to access personal data in its archives in paper and/or electronic format;
- the right to request corrections, updating and deletion, if incomplete or erroneous, as well as to object to its processing for legitimate and specific reasons;
- the right to obtain the correction of incorrect personal data without undue delay. Taking into account the purposes of processing, the data subject has the right to obtain the integration of the personal data that may be incomplete, also providing a supplementary statement;
- the right to obtain the deletion of the personal data that concern him without undue delay, if one of the reasons referred to in Article 17, paragraph 1 of the Regulation applies;
- The right to obtain the limitation of the processing when one of the cases referred to in art. 18, paragraph 1 of the Regulation occurs;
- the right to lodge a complaint with a supervisory authority, as well as to exercise the other rights recognized by the applicable legislation.

The data subject can exercise his rights by contacting the Data Controller at the addresses below, without prejudice to the mandatory provisions provided for by the regulations in force at the time of the request, that may not allow to execute the agreement or to properly fulfil all legal obligations related to the agreement.

Data Controller

The rights under discussion may be exercised, also through a representative, sending a request to the **Data Controller** contactable at the premises of the company in via Bruino 26 - Rivalta di Torino (TO) - Phone +39 011 9038581 or at the following e-mail address: u.direzione@opacgroup.com.

The Data Controller is **OPAC S.r.l.**, via Bruino 26 - Rivalta di Torino (TO) – Phone +39 011 9038581 represented by its Legal Representative. E-mail: u.direzione@opacgroup.com

The full text of the EU regulation 2016/679 (GDPR) is available at the site of the Italian Supervisory Authority www.garanteprivacy.it.



ANNEX: EXCERPT FROM CHAPTER III "RIGHTS OF THE DATA SUBJECT" EU Reg. 2016/679

Article 15 - Right of access by the data subject

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- (a) the purposes of the processing;
- (b) the categories of personal data concerned;
- (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- (f) the right to lodge a complaint with a supervisory authority;
- (g) where the personal data are not collected from the data subject, any available information as to their source;
- (h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.