



*Personal data processing information notice
(Articles 13-14, EU Regulation no. 2016/679 and current
Italian legislation)*

Perin Spa with registered office in Albina di Gaiarine (TV), 30 Europa Street, VAT reg. no. 03481290264, in its capacity **Data Controller**, pursuant to and for the purposes of **Articles 13-14 EU Regulation no. 2016/679** and of current Italian legislation, would like to inform you that your personal data will be processed in accordance with the following methods and purposes:

1. Object of data processing

The Data Controller processes

- general and contact details of customers/suppliers (including for example: name, surname, identity document, tax code, address, e-mail, telephone number), as well as payment data (information regarding payment methods e.g. credit card) communicated when drawing up and signing contracts for services or when filling out forms on the website <https://www.perinspa.com> required to ask information concerning the services or when subscribing to our “Newsletter”;
- data of website users related to the preferences and interests (such as in particular: content used, use of services, features used, connection times, traffic data, site browsing data and social profiles of the Data Controller or of commercial partners or third parties, IP address, devices and connection used) collected also by means of cookies and metadata;
- personal data of employees/free lances or consultants (such as: name, surname, permanent address, contact information, etc.), data indicating health status/suitability or unsuitability to perform specific tasks, trade union orientation, religious or political beliefs, in addition to legal views, communicated when subscribing an employment contract and/or managing the labour relationship;
- data concerning company’s employees/free lances or consultants found on social networks (such as: interests, collaborations, aptitudes, etc.), data indicating health status/suitability or unsuitability to perform specific tasks, trade union orientation, religious or political beliefs, in addition to legal views, data relating to presence at work communicated during management of the labour relationship and data related to the use of the company's information technology equipment (e-mail, search history, phone calls, etc.) collected in the event of investigations on company tool and information security.

PERIN SPA

31018 Albina di Gaiarine TV Italy

Tel.0039043475044 Fax.00390434-759190

CF e PI 03481290264

Email: info@perinspa.com Web: www.perinspa.com



2. Purpose and legal basis of data processing

The personal data described above may be processed for the following purposes:

A) to fulfil a contract and Data processing is legitimate since the legal ground is based on the need to:

- perform the contract or fulfil the Data Controller's contractual obligations;
- fulfil pre-contractual, contractual and tax obligations resulting from the relationship outstanding with you;
- fulfil obligations provided by law, by a regulation, by Community law or by an Authority's order (such as with regard to money laundering);
- exercise the Data Controller's rights (for example the right to take legal action and defence in court);

B) for the purpose of marketing and Data processing is legitimate since the legal ground for the same is based on the express consent provided to:

- receive by e-mail, mail and/or text messages and/or telephone, newsletters, informative and commercial communications and/or advertising material on products or services offered and surveys on customer satisfaction on services quality;
- receive by e-mail, mail and/or text messages and/or telephone, informative, commercial and/or promotional communications from third parties (for example, business partners).

C) for the purpose of direct marketing and Data processing is legitimate since the legal ground for the same is based on the legitimate interest of the Data Controller to:

- to send you commercial communications relating to services and similar products to those you have already used.

PERIN SPA

31018 Albina di Gaiarine TV Italy

Tel.0039043475044 Fax.00390434-759190

CF e PI 03481290264

Email: info@perinspa.com Web: www.perinspa.com



D) for the purpose of profiling and Data processing is legitimate since the legal ground for the same is based on the consent to:

- legitimise the analysis, including automated analysis, of preferences and interests (for example, use of content and services, including those purchased, features used, connection times, traffic data, etc.) and allow commercial proposals (with ordinary letters, telephone calls, emails, text messages, MMS, notifications and newsletters) of personalised services, content, initiatives and offers;
- legitimise the analysis, including automated analysis, of use of services, preferences and interests (for example, access, use of content and services, features used, traffic data, etc.) and allow commercial proposals (with ordinary letters, telephone calls, emails, text messages, MMS, notifications and newsletters) of services, content, initiatives and offers personalised for you;

E) for the purpose of protecting company security and Data processing is legitimate since the legal ground for the same is based on the legitimate interest to:

- protect information technology systems and confidential and non-confidential company information
- defend own rights in court

3. Data processing methods

Your personal data will be processed on paper and digital means. All data will be processed in accordance with principles of correctness, lawfulness and transparency and may also be performed with automated procedures designed to store, manage and transmit personal data using appropriate tools to ensure the security and confidentiality of the same by means of appropriate procedures that prevent risks of loss, unauthorised access, unlawful use and dissemination of data.

4. Communication of personal data

Your personal data may be provided to authorised personnel and/or data processors (such as persons who supervise the computer system [system administrators]), companies and/or professional partnerships that provide accounting, administrative, tax, legal, fiscal and finance assistance and advice (accountants, employment consultants, lawyers, etc.), subjects operating in the legal sector, counterparties and their legal representatives, collegiate arbitration courts and, in general, all public bodies (INPS [National Institute of Social Insurance], INAIL [National Institute for Industrial Accident Insurance], INL [Italian Employment Inspectorate], etc.) and private entities (funds, pension and assistance funds, trade unions, etc.), to whom your data must be communicated for the correct performance of the contract.

PERIN SPA

31018 Albina di Gaiarine TV Italy

Tel.0039043475044 Fax.00390434-759190

CF e PI 03481290264

Email: info@perinspa.com Web: www.perinspa.com



5. Period of retention

The Data Controller retains any personal data processed for the purpose of performing a contract for the period of time required to manage any contractual obligations and in any event for no longer than **10 years**; any personal data processed for marketing purposes (including indirect marketing) and/or customer satisfaction surveys are retained for no longer than **24 months** from receipt of the customer's consent; any personal data processed for profiling purposes is retained for no longer than **12 months** from receipt of the customer's consent; data concerning navigation logs is retained for **3 months**; any personal data processed to defend a right will be retained for the period time reasonably necessary for any such purposes and for the period time in which said claim may be pursued. Once the above terms of retention have expired, the data will be made anonymous and processed for aggregate and anonymous statistical analysis.

6. Transfer of personal data

Personal data may also be communicated to the Data Controller's offices and/or to offices of other associated/subsidiary companies inside and/or outside the EU, which, in their capacity as Joint Data Controllers, have signed an agreement with the Data Controller. Said offices - with particular attention to those located in non-EU countries - have been provided with detailed operating instructions by means of contractual clauses that guarantee that personal data will be processed in accordance with the principles established in EU Regulation no. 2016/679 even third countries of destination. The Data Controller reserves the right to use cloud services, undertaking to select service providers from those providing adequate safeguards, as set out in Article 46 of EU Regulation no. 2016/679.

7. Rights of data subjects

You are entitled to request from the Data Controller access to and rectification or erasure of your personal data, to have incomplete personal data completed or restrict the processing of any personal data provided. You are also entitled to receive any personal data concerning you in a structured, commonly used and machine-readable format. You also have the right to withdraw your consent to processing at any time and to object in full or in part to the processing of your personal data. You are further entitled to lodge a complaint with the supervisory authority and to exercise the other rights recognised to you pursuant to Articles 15 - 22 of EU Regulation no. 2016/679.

PERIN SPA

31018 Albina di Gaiarine TV Italy

Tel.0039043475044 Fax.00390434-759190

CF e PI 03481290264

Email: info@perinspa.com Web: www.perinspa.com



8. How to exercise your rights

You may exercise your rights at any time by contacting the Data Controller by sending an e-mail to: privacy@perinspa.com or amministrazione@pec.perinspa.com or by lodging a complaint with the supervisory authority.

If you are no longer interested in our communications and would like to cancel your subscription to the Newsletter, click on the “cancellation” link at the bottom of each e-mail sent or send an e-mail to privacy@perinspa.com

To stop receiving promotional e-mails, please follow the relevant instructions or send a notification to privacy@perinspa.com

9. Amendments and updates

This information notice may be amended. Please refer to our website, company notice boards and other channels made available for updates.

Albina di Gaiarine, 25th May 2018

The Data Controller

Perin spa

PERIN SPA

31018 Albina di Gaiarine TV Italy

Tel.0039043475044 Fax.00390434-759190

CF e PI 03481290264

Email: info@perinspa.com Web: www.perinspa.com