

Information to customers and suppliers pursuant to art. 13 of the European Regulation 2016/679 on data protection

The processing of data relating to legal persons does not fall within the scope of the regulations on the protection of personal data provided by the Regulation. For the sake of clarity and transparency towards its Customers and Suppliers, Gruppo Zenit srl. makes this information also to legal persons, describing the methods and purposes of all the treatments that the Company carries out or has the right to carry out on personal data. The information specifically concerns the data of natural persons who work for our customers and suppliers.

1. Introduction

Pursuant to art. 13 of EU Regulation 2016/679, Gruppo Zenit Srl (hereinafter "the Company"), with registered office in Novara Largo Donegani 8, VAT number 02643670033, which can be contacted for the exercise of the rights permitted by current legislation at the address of the headquarters, Data Controller of personal data already communicated or that will be communicated in the future and from which the personal data are or will be collected, wishes to inform you that the data concerning you may be processed, in compliance with the aforementioned legislation, by the Company in relation to the contractual relationships with you or those that may be entertained in the future.

For any information regarding privacy, the company has appointed a DPO who can be reached at dpo@zenit.it

2. Source of processed Personal Data

Personal data, acquired or that will be acquired in relation to contractual relationships or in the pre-contractual phase, are collected directly from the interested party. All personal data collected are processed in compliance with current legislation and, in any case, with due confidentiality.

3. Scope of the collection

For the stipulation and execution of the contractual relationship, the collection of personal data is also mandatory since it is necessary to comply with legal and tax obligations; the refusal to provide such personal data will make it impossible to establish relations with the Company. The related processing does not require the consent of the interested party.

4. Purpose of the processing and legal basis of the processing

The collection or processing of personal data has the exclusive purpose of adequately providing for the obligations related to the performance of the Company's economic activity and in particular for:

- the execution of pre-contractual activities and the acquisition of preliminary information for the purpose of concluding the contract;
- the management of the contractual relationship and of all administrative, operational, managerial and accounting activities related to the contract (order management, invoicing, checks on the reliability of customers and suppliers, after-sales assistance and support);
- the management and litigation, breach of contract, warnings, transactions, arbitrations, judicial disputes;
- the fulfillment of the obligations provided for by laws, regulations, community regulations and provisions issued by authorities.

The processing is carried out in order to fulfil the contractual/pre-contractual and legal obligations related to the relationship you have established with the Company.

5. Nature of the provision and consequences of any refusal

It is mandatory to provide personal data to the Company only for personal data for which there is a regulatory or contractual obligation to do so, or for personal data necessary to acquire pre-contractual information activated at the request of the interested party. In the event of any refusal to provide such "mandatory" personal data, the contract may not be fully exercised. Any refusal to provide personal data for which there is no obligation to provide, but strictly functional to the execution of contractual arrangements, will not in principle entail any consequence in relation to the relationships in progress, except for the possible impossibility of following up the operations related to such personal data or the impossibility of establishing new relationships. Any refusal to provide personal data related to the performance of further activities, not strictly functional to the execution of contractual relationships, will only prevent the conduct of such further activities without other consequences.

6. Processing methods

The processing of personal data will be carried out lawfully and correctly and in any case in accordance with the aforementioned legislation, using suitable tools to guarantee security and confidentiality and may also be and affected through IT tools designed to store, manage and transmit the data.

The processing will be carried out, primarily, by the internal organization of the company under the direction and control of the company functions in charge and for the purposes indicated above, also by group companies or third parties, as identified in point 9 below.

The storage of personal data will take place in a form that allows the identification of the interested party for a period of time not exceeding that necessary for the purposes for which they are collected and processed.

7. Duration of processing

The personal data being processed will be kept for the time strictly necessary with regard to the contractual relationship, as well as, subsequently, for the fulfillment of all legal obligations connected with or deriving from the contract you have stipulated with the Company.

8. Recipients of personal data

Without prejudice to communications made in fulfillment of a legal obligation, regulation or community legislation and intra-group communications, communication, even through simple consultation or making available of personal data that concern you, may intervene against the following subjects:

- a. public bodies, supervisory bodies, authorities or institutions;
- b. Companies belonging to the Zenit Srl Group, subsidiaries or associated with our Company, located in Italy or abroad;
- c. Physical or legal persons who provide specific services: data processing, logistics and postal services, customer satisfaction surveys, legal, administrative, tax and/or accounting advice, organization of fairs and communication events;
- d. commercial intermediaries, banks and credit institutions, financial intermediation companies, natural or legal persons responsible for credit recovery, auditing and / or certification of financial statements and quality systems, independent collaborators of the Company, agents and reporters, insurers and brokers;
- e. natural and / or legal persons who request references / data for the purpose of participation in public contracts, or in the context of the execution of supply contracts to their customers.

The subjects referred to in points a), d), e) operate as independent Data Controllers.

We reassure you that, in any case, the aforementioned subjects are transferred exclusively, if not aggregated and anonymous personal data, the personal data necessary and relevant to the purposes of the processing to which they are appointed.

The list of such third parties will be constantly updated and accessible to you upon request to the Company. By virtue of the existence of connections with them by means of blood, computer or correspondence, personal data may be made available abroad, possibly even outside the countries belonging to the E.U. in consideration of the existence of the relative authorization, or on the basis of standard clauses and contracts. Personal data will not be disclosed in any case.

9. Data Subjects' rights

Your right to exercise the rights of access to the references indicated in the introduction to personal data provided for by art. 15 of the EU Regulation 2016/679 and the rights provided for by Articles 16, 17, 18, 21 of EU Regulation 2016/679 regarding the rectification, cancellation, limitation of processing and the right to object, in the manner established by Article 12 of EU Regulation 2016/679.

10. Right to lodge a complaint pursuant to art. 77 EU Regulation to the Guarantor Authority

If Our Company does not provide you with feedback within the time provided for by law or the response to the exercise of your rights is not suitable, you can lodge a complaint with the Guarantor for the protection of personal data.

Below are the coordinates: Guarantor for the protection of personal data - www.gdpd.it - www.garanteprivacy.it - E-mail: garante@gdpd.it - Fax: (+39) 06.69677.3785 - Telephone: (+39) 06.69677.1