

PRIVACY POLICY PURSUANT TO THE REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT

In accordance with the Regulation on the protection of individuals with regard to the processing of personal data and on the free movement of such data, namely Regulation (EU) No. 2016/679 of the European Parliament, Gleisfrei srl, in its data processor quality, must acquire or already holds personal data that concern you, including data "sensitive, judicial or particular".

In compliance with the principle of transparency established by art. 5 of the Regulation, Gleisfrei srl provides you with the information required by articles 13 and 14 of the Regulations.

1- Data controller

The Data Controller is supported by external personnel for the provision of some necessary services (technical-administrative management, H&S management) and they could come to knowledge of users' personal data, for the only purpose of the requested service.

2- Operative controller

All the Personal data will be processed by instructed and trained personnel in compliance with the particular data pertaining to the competent structures for the various types of treatment.

3- Categories of interested parties

Suppliers of goods and services, occasional collaborators, economic operators.

4- Data management

The personal data are managed to allow the verification of judicial, fiscal and behaviour positions of suppliers and economic operators that are in relationship with Gleisfrei srl in order to:

- carry out the preliminary activities related to the acquisition of goods and services;
- coordinate and analyze the preparation of technical, administrative and contractual documentation;

5- Purpose of the processing for which the data are intended

The processing of the data indicated above is carried out in compliance with the Regulation and with the principles of confidentiality and privacy to which Gleisfrei srl also adheres.

The personal data are processed for the following purposes:

- a) fulfill the pre-contractual, contractual and fiscal obligations deriving from existing relationships with you;
- b) conclude the contracts for the owner's services;
- c) fulfill the obligations provided for by the law, by a regulation, by EU legislation or by an order of the Authority (such as in the field of anti-money laundering);
- d) exercise the rights of the Data processor (for example the right of defense).

We also inform you that:

- in relation to the purposes referred to points a), b) the processing may be carried out without your consent as it is necessary for the execution of the contract of which you are a part (art. 6.1 letter b) of the Regulation);
- in relation to the purposes referred to in points c), d) the processing may be carried out without your consent as it is necessary to comply with legal obligations (Article 6.1 letter c) of the Regulation).

6- Processing method

All the personal data will be processed using paper form and electronic ones in compliance with the law provisions and with the appropriate technical and organizational measures pursuant to art. 32 of the Regulation, with the observance of every precautionary measure that guarantees its integrity, confidentiality and availability.

GleisFrei s.r.l.

Sede legale: Via Villetta, 4 - 46033 CASTEL D'ARIO (MN) – ITALY

Sede operativa: Via I° Maggio, 3 - 46039 VILLIMPENTA (MN) - ITALY

tel. +39 0376 573056 r.a. – fax +39 0376 573051 – info@gleisfrei.com - www.gleisfrei.com

Capitale sociale: € 10.000,00 int. versato – P. IVA e C.F./Reg. Imprese di Mantova: 02032740207

7- Categories of recipients to whom the personal data are disclosed

In order to carry out some of its activities, Gleisfrei srl. outsources services to third parties, which fall into the following categories:

- companies providing banking, financial and insurance services;
- Public administrations;
- companies that carry out operations on behalf of the Company, specially qualified as "data processors" and required to comply with data protection obligations, pursuant to a specific contract stipulated with the Company;
- public and private entities, who can access the personal data by provisions of law within the limits set by these rules (Public Security Authority, Judicial Authority, Authorities Regional and National Healthcare);
- professionals and external consultants, for the purpose of the study and resolution of legal problems relating to contractual positions (eg: lawyers).

Your data will also be processed, exclusively for the mentioned purposes, by company employees and / or collaborators, specifically authorized and instructed by the Data Controller.

Your personal data will not be disseminated or transferred to non-EU countries, unless required by a law, regulation or EU legislation.

8- Retention period of personal data

The data will not be kept for a period of time longer than necessary to satisfy the purpose for which they were processed complying with the legal limits.

To determine the appropriate retention period, Gleisfrei has considered the quantity, the nature and sensitivity of the personal data, the purposes for which they are processed and whether it is possible to achieve these purposes by other means.

When you no longer need your personal information, they will be deleted or destroyed.

9- Exercising the personal data access right and other rights

In relation to the provided personal data, the Data Subject can exercise the following rights guaranteed by the Regulation:

- access right;
- right to rectification, modification and cancellation of personal data or the right of restriction of the processing of the former;
- right to object the processing;
- right to withdraw the consent
- right to send a complaint to the competent Supervisory Authority (Garante)

The Data Subject can exercise any of the above mentioned rights from point a) to point e) sending a written communication: - via email to: info@gleisfrei.com; - via recommended letter to: Gleisfrei srl - Via Primo Maggio, 3 46039 Villimpenta MN – Italia

Gleisfrei srl. has not appointed a Data Protection Officer (DPO) because not subject to the legal obligations.

In the event of future appointment and in the event of significant changes, appropriate information will be provided for a reasonable time on the homepage of the site.

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