



Information on the processing of personal data

Information according to art. 13 EU Regulation n. 2016/679 concerning the protection of personal data (hereinafter: "GDPR") and in compliance with Legislative Decree No. 101 of 8 August 2018 which amended Legislative Decree no. 30.06.2003 n. 196, "Privacy Code".

In accordance with the requirements set by the General Regulations on the protection of personal data, the Data Controller provides the data subject with the following information in relation to the processing of personal data.

CONTROLLERR OF THE TREATMENT	
Company name and DATA CONTROLLER (later said Controller).	CLEO S.r.l Later, the "CONTROLLER"
Address	Via del Fosso n.6 52100 Arezzo (AR)
PIVA / CF N° CCIAA	P.IVA e Cod.Fisc.: 01293010516 CCIAA: AR 95954
Contacts	Phone. +39 0575 383258 Fax. +39 0575 383259 e-mail: info@cleosrl.it
Data Controller and Legal representative	Mario Piccini
Privacy contact person	Ilaria Piccini
Data Protection Officer (DPO)	not necessary.
Co-controllers of the treatment	No co-CONTROLLER
Third parties data processor	The list of appointed third party data processor or co-controllers is available at the headquarters on specific request.
<i>If you wish to request further information on the processing of your personal data or for the eventual exercise of your rights, you can contact in writing directly to the Privacy contact person indicated above.</i>	

CATEGORIES OF THE INTERESTED	
List of categories of data subjects	Customer (Physical and legal persons), Suppliers (Physical and legal persons), Banks and Financial Companies, Consultants and professional, Employees, third parties, also natural persons with whom a request for information is established through access to web and social platforms.

TREATMENT MADE
Essential treatments for the execution of the contract with the customer



Description	Treatments functional to the sales activities of the commercialized items, functional to the fulfillment of the accounting and fiscal fulfilments, to the fulfillment of contractual and pre-contractual obligations, to the management and execution of the indispensable activities to provide the customer with the established service / product and related accounting , obligations similar to the previous ones for the completion of purchasing practices with suppliers, obligations concerning the administrative management of personnel, activities related to participation in promotional events (trade fairs, meetings, events, ...).
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ORIGIN, PURPOSE, LEGAL BASE AND NATURE OF DATA PROCESSED	
Origin	Data is collected from the 'data subject', or communicated by him to the Data Controller through direct communication, both paper and / or communicated by any electronic means.
Purposes of the processing	
<p>a) Management of the formalities related to the practices of customer requests;</p> <p>b) Litigation management;</p> <p>c) Monitoring of contractual obligations;</p> <p>d) Scheduling of work activities;</p> <p>e) Services to protect consumers and users (complaints and / or guarantees);</p> <p>f) Reporting activities for names acquired directly by consent to specific treatment for specific research activities and reporting of availability of articles and / or products such data are stored in paper format where consent is acquired directly on that support or acquired via electronic communication (email or message on other platforms). Failure to consent will result in exclusion from such treatments;</p> <p>g) Advertising - For the sending of advertising documentation of the products and initiatives of the Data Controller, the specific consent for such processing shall be obtained by written consent in paper form to the data subject or acquired electronically on the company's web and social platforms. The data are stored in such a way as to be made accessible to interested parties to allow any corrections or cancellations of consent in electronic and / or paper format where consent is acquired through such support. Failure to consent will result in exclusion from these treatments.</p> <p>h) Management of complaints, personal data are stored in the format in which they arrive (paper or electronic e-mail) and stored for their resolution, relative correspondence and possible transmission to lawyers;</p> <p>i) Information to customers of availability of specific articles, the data for sending such communications are acquired in a specific manner similar to point g);</p> <p>J) Administrative, accounting, tax, treasury management, and with banks and financial and insurance institutions;</p> <p>k) Services for the protection of assets and corporate assets (eg video surveillance, ...)</p>	
Legal bases concerning data processing	
<p>a) Processing is necessary for the performance of a contract of which the data subject is a party or for the implementation of pre-contractual measures taken at the request of the same;</p> <p>b) The processing is necessary for the execution of a formality (request for information, request for an estimate, etc.) of which the interested party is a party or for the execution of preparatory measures taken at the request of the same;</p> <p>c) The processing is necessary to fulfill an administrative / accounting obligation to which the data controller is subject;</p> <p>d) Processing is necessary to fulfill a legal obligation to which the data controller is subject;</p> <p>e) The processing is carried out as a result of a prior request and specific authorization granted in a formal manner referred to as Consent of the Interested Party;</p> <p>f) Processing is necessary to fulfill a legal or legal obligation to which the data controller is subject;</p> <p>g) Processing is necessary to fulfill a legal obligation to retain the data to which the data controller is subject;</p> <p>i)The processing is necessary to fulfill a legal obligation to which the data controller is subject has been solicited under the GDPR (right to be forgotten, corrections, limitations, cancellations, communications ...).</p>	
<p>The "particular" data (sensitive data) are those defined by art. 4 of the Code and the art. 9 of the GDPR These data are processed, in compliance with the provisions of the Code and the GDPR, as well as with the light of General Authorization</p>	



no. 4/2016, of the General Authorization n. 7/2016 and the Authorizations for the processing of judicial data and sensitive data related to the activity of mediation aimed at reconciliation of civil and commercial disputes of 21 April 2011 adopted by the Authority for the protection of personal data (hereafter also "Guarantor"), by the Data Controller on the legal bases as required by art. 9 and reconfirmed by Legislative Decree 101/2018

Data processed	a) Personal data in accordance with current tax legislation, data relating to the contact persons for legal entities with which the Data Controller has various types of relationships, economic, commercial, financial and insurance activities, tax code and other personal identification numbers, bank details, Address of residence, e-mail address, nature of the treated goods, name, address or other personal identification elements, names acquired through access by the interested parties on the web and social platforms.
special categories of personal data ('sensitive data') processed	b) Sensitive data relating to the administrative management of employees; c) Sensitive Data related to judicial protection for activities of defense of the Data Controller's property and assets.
Legal basis art. 9	a) Contractual legal obligations (Article 9 Par. 2 point (b, etc.) b) Compliance with the judicial protection of the Data Controller (Article 9 Par. 2 point (f, etc.)

ADDRESSEES OR CATEGORIES OF ADDRESS OF PERSONAL DATA

Recipient categories	The communication of your personal data is required, carried out on the legal bases established by art.6 of the GDPR "Lawfulness of treatment" previously defined to the following third parties:
	Judicial Offices, Local Authorities, Consultants and freelancers, Companies and businesses including internet services entrusted with all or part of the treatments, Banks and credit institutions, Social security and welfare organizations, Other public administrations, Professional orders and colleges, Employers work, Associations of entrepreneurs and companies, Trade unions and patronati, Joint bodies in the field of work, any controlling companies, subsidiaries and affiliates, INPS, Ministries (economy and finance), INAIL, ASL, hospitals and regions, judicial authorities , Chambers of Commerce, Industry, Crafts and Agriculture.
	These bodies, organizations, companies and professionals act as Data Processors appointed by the Data Controller or are themselves independent Data Controllers of the processing of personal data transmitted to them.

Your personal data, or the personal data of third parties in its ownership, may also be disclosed to external companies, identified from time to time, to which the Controller entrusts the execution of obligations arising from the task received to which the data will be transmitted necessary for the activities requested by them. All employees, consultants, temporary workers and / or any other "natural person" who carry out their activities on the basis of the instructions received from the CONTROLLER, pursuant to art. 30 of the Code and art. 29 of the GDPR, are appointed "Assigned or authorized to treatment" (hereinafter also "Assigned"). The Data Controller or the Managers, who may have been appointed, shall provide appropriate operating instructions, with particular reference to the adoption and compliance with security measures, in order to guarantee the confidentiality and security of the data. Precisely with regard to the aspects of protection of personal data you are invited, pursuant to art. 33 of the GDPR to report to the Data Controller any circumstances or events from which a potential "breach of personal data (data breach)" may occur in order to allow an immediate evaluation and the adoption of any actions aimed at countering such event by sending a communication to the CONTROLLER.

The Data Controller's obligation to communicate the data to Public Authorities and to the Guarantor in the manner envisaged by legislation on specific request.



TRANSFER to foreign countries

Transfers to foreign countries (EU and non-EU) or to international organizations

- Any transfer to foreign countries or to international organizations is limited to satisfying possible customer order execution practices in other EU and non-EU countries; for the latter, the respective privacy rules apply. These transfers are without prejudice to the data used on the website for statistical activities of accesses and visits but made anonymous. The website is then made available information on Cookies with the relative consent checkboxes as well as a copy of this.

The transfer of your personal data abroad may occur if it is necessary for the management of the assignment received (for example, shipping from or to another country in the EU). For the treatment of the information and data that will be eventually communicated to these subjects will be required the equivalent levels of protection adopted for the processing of personal data of its employees. In any case, only the data necessary for the pursuit of the intended purposes will be communicated and the regulatory instruments provided for by the articles will be applied. 44 and 45 of the Code and by Chapter V of the GDPR.

METHODS, LOGICS OF TREATMENT AND STORAGE TIME

Duration of treatment

The data processing will have a duration equal to that provided by specific law and in any case not more than 10 years from the end of the relationship.
 The treatment duration for data relating to reports of commercial information only will instead be only 5 years from the last request.

Your data are and will be collected and registered in a lawful and correct manner for the purposes indicated above in compliance with the principles and provisions of art. 11 of the Code and 5 c 1 of the GDPR.
 The processing of personal data is done by manual, computerized and telematic tools with logic strictly related to the purposes themselves and, in any case, in order to guarantee their security and confidentiality and protection.

NATURE OF THE CONFERENCE

The processing of personal data will be carried out for the following purposes:

Purposes that do not require consent

- Administrative and accounting management (customers, suppliers, agents, third parties with whom economic relationships have been established)
- Monitoring of contractual obligations
- Management of administrative and tax litigation
- Internal control services
- Services to protect consumers and users
- Protection of ownership of the client or worker
- Accounting or treasury management
- Services to protect corporate assets (eg images acquired for protection and security)

Purposes that require consent

- Marketing (communications and analysis and market surveys) - See specifications of how consent is acquired, how it is preserved and the consequences of non-consent
- Advertising - See specifications of how consent is acquired, how it is preserved and the consequences of non-consent
- Sending information and / or advertising material also by telephone or internet - See specifications of how the consent is acquired, how it is stored and the consequences of the lack of consent
- Forwarding information to customers about new services / products. See

	<p>specifications of how consent is acquired, how it is preserved and the consequences of the lack of consent</p>
	<p>Only subject to your explicit consent to be made at the foot of this disclosures, or by checking the similar requests entered on the website of the Data Controller, the data, the purposes of which require consent, will be processed for the specific purposes agreed. The conferment of data is however optional and will not entail prejudice in relation to the contractual relationship existing with the Data Controller, except for the exclusion of the formality for which the specific consent was requested.</p>
<p>For the data collected and used for needs related to the execution of activities related to the contractual relationship and compliance with the obligations indicated by law, your consent is not required, but a copy of this treatment information will be provided. Failure to provide the personal data referred to above will make it impossible to proceed with the report in question. For the data collected and used for the legitimate interest of the Data Controller, your consent is not required (letter f, article 6, of the GDPR). The communication of personal data referred to above is optional but necessary for the execution of the services offered by the Data Controller. Any refusal to communicate such data will make it impossible to provide all or part of the services requested.</p>	

RIGHTS OF THE INTERESTED (Articles 15 to 22 and Article 13 of the GDPR)	
Right of access	The interested party has the right, according to the provisions of articles from 15 to 22 and from the art. 13 of the GDPR to request the CONTROLLER to access their personal data.
Right of rectification	The interested party has the right, according to the provisions of articles from 15 to 22 and from the art. 13 of the GDPR to request the Data Controller to rectify their personal data.
Cancellation right	The interested party has the right, according to the provisions of articles from 15 to 22 and from the art. 13 of the GDPR to request to the CONTROLLER the cancellation of their personal data except for those for which they insist specific laws on conservation.
Right of limitation	The interested party has the right, according to the provisions of articles from 15 to 22 and from the art. 13 of the GDPR to request the Data Controller to limit the data concerning him
Opposition right	The interested party has the right, according to the provisions of articles from 15 to 22 and from the art. 13 of the GDPR to oppose their treatment.
Right of portability	The interested party has the right, according to the provisions of articles from 15 to 22 and from the art. 13 of the GDPR to exercise its right to data portability.
Right of revocation	The interested party has the right, according to the provisions of articles from 15 to 22 and from the art. 13 of the GDPR to exercise its right to revoke consent.
Claim right	The interested party has the right, according to the provisions of articles from 15 to 22 and from the art. 13 of the GDPR to exercise its right to lodge a complaint with the

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	supervisory authority.
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AUTOMATED PROCESS	
Automated processes	Personal data are processed automatically through the use of computers and software management, archiving and specific administration treatments equipped with appropriate protection and rescue measures.
Automated processes or profiling methods	-Classification of customers, market analysis, analysis by geographical area, classification for sending specific communications such as price lists, information on availability of lanes or promotions of assistance such as forwarding and reporting on social platforms.
Legal basis	- Legal bases of processing related to compliance with legal obligations and completion of commercial formalities. - Explicit and voluntary consent given by the interested party to the Data Controller and to the various social platforms to which the various interested parties have freely adhered and whose operating methods are respected.

The Data Controller reserves the right to make this information on the processing of personal data any changes deemed appropriate or made mandatory by current regulations, at its sole discretion and at any time and for compliance with the continuous adjustment (Accountability). On such occasions, users will be appropriately informed of the changes made.

The DATA CONTROLLER

CLEO SRL

Consensus expression

ACKNOWLEDGMENT

- I declare that I have read the above information and / or provided to me and available as a copy on the website.

CONSENT TO THE PROCESSING OF PERSONAL DATA

a) Consent for the processing of data exceeding the processing envisaged by law but whose purpose is contact activity for the required formalities and also for Marketing (direct contacts, analysis and surveys and market evaluations) see above information on the purposes and methods of treatment.	<input type="checkbox"/> YES	<input type="checkbox"/> NO
b) Consent for the purpose of: Direct advertising - see above information on the purposes and methods of treatment. Failure to consent will prevent the sending of advertising and informational documents on CLEO SRL products and initiatives	<input type="checkbox"/> YES	<input type="checkbox"/> NO
c) Consent for the purpose of: Sending information and / or advertising material also by telephone or e-mail see above information on the purposes and methods of treatment. Failure to consent will prevent the sending of advertising and informational documents on CLEO SRL products and initiatives	<input type="checkbox"/> YES	<input type="checkbox"/> NO
d) Consent for the purpose of: Sending newsletters about the activities and initiatives of CLEO SRL (eg discount campaigns, participation and invitations to fairs, events, etc.) by e-mail - see above information on the purposes and methods of treatment. Failure to consent will prevent the sending of advertising and informational documents on CLEO SRL products and initiatives	<input type="checkbox"/> YES	<input type="checkbox"/> NO

SIGNATURE OF THE INTERESTED PARTY

Name and surname

Please return properly completed and signed in full (legible signature) by the interested party.