



Privacy notice pursuant to articles 13 and 14 Reg. UE 2016/679 (GDPR)

TENENGA SRL (tax code and vat number 02956661207), in the person of its *pro tempore* legal representative Ubaldo Tenenga, with its registered office located in via S. Quasimodo 40, 40013 Castel Maggiore (BO), as the Data Controller, informs you that the personal data you provide will be treated in the following ways and in compliance with the principles articulated in the GDPR.

1. Sources and categories of data

The personal data processed are those collected directly from the data subject or provided to the Data Controller by third parties in the exercise of its business. The Data Controller will process common personal data of customers, suppliers and their employees and/or collaborators and/or contact persons and personal data collected during the browsing by users on the Data Controller's websites (www.tenenga.it and www.inventag.it) and, in particular, e-mail addresses, names, surnames and any other data provided, for example during the request for information received to the e-mail address of the Data Controller; requests for information via web form; newsletter subscription requests.

2. Purpose and legal basis of the processing

Personal data will be processed for the following purposes:

2.1 to conclude contracts with the Data Controller and manage the related relationships in the pre-contractual, contractual, fiscal, administrative and accounting phases; (the legal basis of treatment is the execution of the contract or pre-contractual measures and the fulfilment of legal obligations pursuant to Article 6 paragraph 1(b) and (c) GDPR);

2.2 to manage disputes and any proceedings that may arise in the execution of the relationship with you (the legal basis of treatment is the legitimate interest pursuant to Article 6, paragraph 1 (f) GDPR).

2.3 direct marketing activities towards customers by sending commercial or advertising communications to the e-mail addresses provided by the data subjects concerning products similar to those already provided by the Data Controller by virtue of a previous contractual relationship, without prejudice to the right of opposition pursuant to Article 21 GDPR in the first or subsequent communication (the legal basis of treatment, in case of soft spam, is the legitimate interest pursuant to art.6 paragraph 1 (f) GDPR);

2.4 direct marketing activities towards prospects for sending commercial or advertising communications relating to the products of the Data Controller, through automated systems (for example, e-mail, SMS, fax, MMS, etc.) and traditional (posted mail and telephone contact) (the legal basis of the treatment is the consent of the data subject pursuant to art.6 paragraph 1 (a) GDPR);

2.5 to respond to the request for information received at the Data Controller's e-mail address indicated on the Data Controller's website (www.tenenga.it) (the legal basis of treatment is the execution of the contract or pre-contractual measures pursuant to Article 6 paragraph 1 (b) GDPR);

2.6 to respond to the request for information formulated by registering on the Data Controller's website (www.inventag.it) (the legal basis of the treatment is the execution of the contract or pre-contractual measures pursuant to Article 6 paragraph 1 (b) GDPR);

2.7 to register to the newsletter to stay updated on the Data Controller's initiatives, products and services (the legal basis of treatment is the consent pursuant to Article 6 paragraph 1 (a) GDPR).

3. Processing methods and data retention period

The data processing will be carried out by means of the operations indicated in art. 4 n. 2 of the GDPR in manual form, using IT and telematic tools.

The data will be recorded, processed and stored in our paper and electronic archives.

The data will be processed by persons authorised to process the data.

For the purposes referred to in Article 2.1, the personal data will be kept for the period of time necessary to achieve the purposes indicated above. Furthermore, the personal data processed may also be stored following the termination of the contractual relationship for a period compatible with the needs related

to events and / or facts and / or rights subsequent to the same. Therefore, due to the current provisions of the law, your data will be kept for 10 years from the termination of the contract, except for interrupting events of the limitation period (art. 2946 c.c. and subsequent).

For the purposes referred to in Article 2.2, for the time strictly necessary for this purpose and, in any case, no later than the applicable limitation periods.

For direct marketing purposes referred to in Articles 2.3 and 2.4, personal data will be kept for no more than 24 months from their acquisition, without prejudice to the right of opposition in case of soft spam (Article 2.3) and the revocation of consent given by the data subject (Article 2.4).

For the purposes referred to in Article 2.5 for the time strictly necessary to process the request.

For the purposes referred to in Article 2.6 the data will be kept for 1 year from the registration and/ or last access.

For the purposes referred to in Article 2.7 the data will be kept until the data subject exercises the right of revocation of consent.

4. Recipients of the processing

The personal data may be made accessible to the Data Controller's employees and/or collaborators as people authorised to process the data who are adequately instructed for this purpose.

The data may be communicated to external subjects for the obligations imposed by the legislation or for a correct execution of the contractual relationship. These subjects will process the data as independent Data Controllers, or as Data Processors, duly appointed in accordance with current legislation (depending on the role they play in relation to the processing): for example, to social security, welfare and insurance institutions, trade associations, tax and labour offices, other companies of the group, professional legal, commercial, tax assistance offices, auditing firms, banks and credit institutions.

5. Transfer of data abroad

Your data will not be transferred to third countries outside the European Union or to international organisations. If for technical and/or operational reasons or for the execution of the contract it is necessary to make use of subjects located outside the European Union, we inform you that the data will be transferred outside the EU in compliance with applicable legal provisions, or, will be carried out by virtue of the existence of an adequacy decision by the European Commission, in the absence of that, on the basis of the adequate guarantees provided pursuant to Articles 46 or 47 of the GDPR (e.g. signing of the "*standard clauses*" of data protection adopted by the European Commission) or if there is a derogation pursuant to Article 49 of the GDPR.

6. Profiling and dissemination of data

The personal data will not be subject to disclosure, nor to any fully automated decision-making process, including profiling.

7. Nature of the provision

The communication of data is mandatory to fulfil contractual and legal obligations and, therefore, any refusal to provide them, in whole or in part, makes it impossible to execute the contractual relationship with you in all its phases.

The communication of data for other purposes is optional and, therefore, any refusal to provide your data will only make it impossible to use the services shown on the Data Controller's websites, such as subscribing to the newsletter or requesting information through registering of the website www.inventag.it and to receive commercial and/or advertising communications for direct marketing purposes, in the manner indicated above.

With reference to direct marketing activities, we remind you that you can exercise, even subsequently, the right to object to the processing of data for this purpose (in the case of soft spam) and the data will no longer be processed for this purpose, or revoke the consent given, in the manner indicated in section 9 below. We also remind you that when the processing of your data is based on consent, the provision is optional and you can revoke the consent given at any time in the manner indicated in paragraph 9 below.

8. The Data Subject's rights

In your capacity as data subject, you may exercise the rights provided for under Articles 15 to 22 GDPR at any time.

In particular, you may:

- access your personal data, obtaining evidence of the purposes pursued by the data controller, the categories of data involved, the recipients to whom they may be communicated, the applicable retention period, the existence of automated decision-making processes, including profiling, and, at least in such cases, significant information on the logic used, as well as the importance and possible consequences for the data subject, if not already indicated in the text of this Privacy Policy;
- obtain without delay the correction of inaccurate personal data concerning you;
- in the cases provided by the law, obtain the deletion of data;
- obtain the limitation of the processing or oppose it, when admitted based on the legal provisions applicable to the specific case;
- in the cases provided for by law, request the portability of the data you have provided to the data controller, i.e., to receive them in a structured format, commonly used and readable by an automatic device, and also request to transmit such data to another data controller, if technically feasible;
- where deemed appropriate, lodge a complaint with the Italian Data Protection Authority (see Article 77).
- In particular, the following rights are recognised: Article 15 – *“The Data Subject's Right to access”*, 16 – *“Right of rectification”*, 17 – *“Right to cancellation”*, 18 – *“Right to limit the processing”*, 19 – *“obligation to notify in case of rectification or cancellation of personal data or limitation of processing”*, 20 – *“Right to data portability”*, 21 – *“Right to object”*, 22 – *“Automated decision-making process relating to natural persons, including profiling”* of the GDPR within the limits and under the conditions provided for by Article 12 GDPR.

In general, we remind you that for the processing of personal data for which the legal basis is consent, this may be revoked at any time, without prejudice to the lawfulness of the processing based on the consent given before the revocation.

9. How to exercise your rights

In the exercise of your rights, you can contact the Data Controller by sending a written communication to the company headquarters or by sending an e-mail to the following address: privacy@tenenga.it

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