

	SPIMELUX S.A. – Pagliare di Spinetoli (AP), Via De Gasperi, 63/A
	PERSONAL DATA MANAGEMENT SYSTEM
PERSONAL DATA HANDLING INFORMATIVE According to the article 13 of GDPR 2016/679	Rev. 00 OF May 16 2018 Pag. 1 of Pag. 2

Dear Supplier/Carrier,

Spimelux S.A. with Head Office in SOLEUVRE, Z.I. Um Woeller 19, Luxembourg, branch in PAGLIARE DI SPINETOLI (AP), Via De Gasperi 63/A, Italy,
 In quality of data holder (below named “The Holder”), processes personal data, concerning contracts products and services supply, respecting individuals data protection as well as free circulations of those, according to the article 13 of European Regulation 679/16 (GDPR) and ss.mm.ii.

1. Scope of the Handling

Handling of personal data, directly provided by involved party and/or collected through the filling of paper forms and/or stored in the Holder website, is solely aimed at:

- a) correct and complete execution of the contract for the supply of goods or effective services;
- b) fulfilment of obligations under contractual relationship laws;
- c) contract management , for example relationships with agents, representatives, clients and / or contractors;
- d) possible external cooperation according to legal obligations;
- e) protection of contractual rights;
- f) internal statistical analysis.

2. Legal Basis

Referring to previous paragraph the provision of personal Data is mandatory in order to fulfil the contract. Failure to provide them determines the impossibility to receive the service requested inside the contract itself; hence the correct execution of it is the legal basis for the data handling, according to the Art. 6, sub. 1, point. b) of European regulation 679/16 (GDPR).

3. Data Handling Method

Personal data are processed in paper form, telematics and computerized, and stored in relative data banks which are made accessible to person in charge of data handling.

Third parties who provide specific elaboration, administrative or instrumental services necessary to achieve the aforementioned purposes, may also carry out the data processing. All operations are performed to guarantee the integrity, confidentiality and availability of personal data.

4. Data retention period

The Holder stores and handles personal data for the strictly necessary time needed to fulfil the indicated scope or for the period imposed by the law in civil and fiscal matters. Data are processed for the necessary time to execute the services requested by the User or required by the purposes described in this document. The User can ask for cancellation or interruption of data processing and usage at any time.

5. Scope of Data Dissemination and Communication

In relation to point 2 data can be communicated to the following subjects:

- Banking institution for receipts and payments management;
- Financial administration or other public authority which have to obey to obligations;
- Companies and Law firms for the protection of contractual rights;
- Salesman and trade representative;
- Clients and/or contractors under contracting /subcontracting;
- External consultants;
- Other external Companies assigned to the processing of activities resulting from the execution of the contract.

6. Data Transferring

According to Point 2, if necessary, personal data might be transferred to EU COUNTRIES and/or to not EU COUNTRIES, in full compliance with the European Regulation 679/16 (GDPR), the provision and decision of privacy guarantor as well as from European community legislation.

7. Rights of interested party

The art. 15, 16, 17 18, 20, 21 and 22 of the European Regulation 679/16 (GDPR) award the interested party with the following rights:

[Art. 15-Right of Data access](#)

The interested party has the right to obtain confirmation from the Holder whether or not a personal data processing is currently running, and, in that case, to have access to all the information related to it.

[Art. 16 – Right of correction](#)

The interested party has the right to obtain from the Holder the correction of incorrect personal data without unjustified delay. Taking into consideration data handling scope, the interested party has the right to obtain integration of incomplete personal data also by providing an additional declaration.

[Art. 17 – Right f cancellation](#)

The interested party has the right to obtain from the Holder the cancellation of personal data without unjustified delay and the holder has the obligation of cancelling them with no delay as well.

[Art. 18 – Right of limiting data processing](#)

The interested party has the right to obtain from the Holder a limitation of data processing when one of the following hypothesis occur:

- a) the interested party disputes the accuracy of personal data for the necessary period for the Holder to verify the accuracy of them;
- b) when data processing is illegal, the interested party opposes to cancellation of them and asks instead that its use is limited;
- c) personal data are necessary for the interested party to ascertain, exercise or defend a right in Court, despite the Holder has no more need for the handling of them;
- d) The interested party has opposed to the processing according to the article 21, section 1, pending verification of legitimate reasons for the Holder compared to the interested party.

[Art. 20 – Right of Data portability](#)

The interested party has the right to receive his/her personal data from a data holder in a structured common format that can be automatically read, and has the right to transfer those data to another data holder without impediments from the data holder who supplied them at first place.

To exercise his/her right concerning data portability, referring to section 1, the interested party has the right to obtain direct transmission of personal data from one holder to another when technically feasible.

[Art. 21 – Right of opposition](#)

The interested party has the right to object at any time to his/her personal data processing according to the Art. 6, section 1, sub. e) or f), for reasons related to his/her particular situation, including also relevant profiling.

[Art. 22 – Right of not to be subjected to automated decision making including profiling](#)

The interested party has the right not to be subjected to a solely automatic data processing including profiling that might produce legal effects concerning him/her or which significantly affects his/her person.

8. How to exercise those rights

Interested party can exercise his/her rights at any time by sending a communication to:

1. e-mail, to the address: spimelux@pec.spimelux.com;
2. registered mail to: Spimelux S.A., Via De Gasperi, 63/A, 63078 Pagliare di Spinetoli (AP).

9. Information updates

This information may change. Any substantial changes will be passed on to the interested parties by notice or publication on the company website

10. Identification of the Holder, manager and persons in charge

The Holder of data processing is Company Spimelux S.A.

The updated list of responsible persons is kept and available at the Holder's headquarters.