

**In application of EU Regulation 2016/679 of 27.4.2016 and of the Privacy Code
Legislative Decree 196/2003 updated by Legislative Decree 101/2018**

As interested parties in the processing of personal data, we hereby inform our Customers and Suppliers, that the regulations referred to in the above heading provide principles and tools to protect people when processing their personal data (ie any information concerning an identified or identifiable real person).

In accordance with the regulations, personal data processing means any operation or set of operations performed with or without the use of automated processes and applied to personal data or personal data sets, such as collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of provision, comparison, interconnection, limitation, cancellation or destruction.

This processing will be based on principles of correctness, lawfulness, transparency and protection of confidentiality.

In accordance with articles 13 and 14 of EU Regulation 2016/679 and of the Privacy Code - Legislative Decree 196/2003 and 101/2018 (in compliance with the legislation of EU Reg. 679/2016), we hereby communicate the following information.

art. 1 Data processed, legal basis and purpose of data processing:

The data being processed are common personal data, collected in the management of relations with customers and / or suppliers for the fulfillment of the obligations deriving from law, contract, uses or habits, with regard to supply contracts and / or purchase and sale, to their management and execution and to the fulfillment of all possible fiscal, social security and administrative duties.

The processing is aimed at fulfilling the obligations and exercising the specific rights of the customer or supplier such as, for example:

- manage the established commercial, contractual and financial relationships;
- execute a service or one or more contractually agreed or related operations, including the acquisition of preliminary information upon conclusion of the contract;
- perform general legal obligations, to comply with all transactions imposed by regulatory obligations, provisions of law, conduct of business and the prescribed provisions on anti-money laundering;
- satisfy operational or management needs, including management of relations with the Customer and / or Supplier for the business of administration, accounting, orders, shipments, invoicing, services, management of any disputes;
- provide news and information related to the activity, including that relating products, services and future commercial initiatives;
- provide technical support, after-sales assistance and verification of customer satisfaction;
- perform any market analysis and internal statistics, both with automated contact methods (e-mail, other remote communication systems via communication networks such as, for example sms, mms, whatsapp) and traditional methods (paper mail) on behalf of the proprietors;
- manage and execute the necessary customs procedures in the case of import / export activities, including storage at our own customs warehouses and assistance in inspection by the competent Authorities;
- perform the transport, logistics and management services for the shipment of requested goods;
- possibly conserve the goods entrusted in custody-storage;
- perform all the necessary procedures for the correct and complete management of the shipment and / or of goods in transit;
- propose announcements of products, services and offers in relation to services similar to those covered in the relationship;
- send via e-mail, mail and / or sms and / or telephone contacts, newsletters, commercial communications and / or advertising material on products or services offered by the proprietor and detection of the degree of satisfaction on the quality of services, including through inclusion in dedicated mailing lists;
- send via e-mail, mail and / or sms and / or telephone contacts commercial and / or promotional communications of third parties (for example business partners);
- authorize the communication of personal data to public bodies and companies of a private nature for the purposes indicated in the information sheet.

The data are processed without express consent (Article 6 letter b and e) of EU Regulation 679/2016 and the communication of personal data is a necessary requirement for the conclusion and execution of the contract.

art. 2 Methods of data processing:

Data processing will be carried out both manually and electronically, using appropriate tools to guarantee security and confidentiality and may also be performed using automated tools to store, manage and transmit the data.

It is possible to arrange, with tools and procedures that guarantee the security and confidentiality of data, for their collection, registration, conservation, organization, processing, profiling for organizational purposes, selection, extraction, comparison, interconnection, communication, blocking, cancellation and destruction.

art. 3 Data retention period:

The determination of the retention period of personal data is governed by the principle of processing needs. Personal data are therefore kept for the whole period necessary for the fulfillment of the purposes indicated in art. 2. and in any case, in compliance with legal obligations, for a period not exceeding ten years from termination of the relationship or otherwise in accordance with terms possibly provided for by specific regulations regarding data storage and documentation.

Specifically, for administration, accounting, orders, management of the entire production flow, assistance and maintenance, dispatch, invoicing, management services for any disputes: 10 years as established under art. 2220 of the Civil Code, subject to any delayed payments of fees that justify its extension.

For marketing purposes, the collected data will be kept for a period of no more than five years from the date of data collection.

art. 4 Nature of the provision of data

The provision of data is optional but necessary to establish and continue commercial and / or contractual relations between the concerned party and **CalPower Srl** based in Via Acquanera 29, Como (CO) - VAT number 03186750133, in person of the legal representative *pro tempore* (hereinafter "the proprietor" or "the Company")

Failure to provide it will result in the inability to establish and / or continue the relationship, to the extent that such data are necessary for the execution of the same.

art. 5 Subjects to whom data may be communicated

The data that will be processed for the duration of the contractual relationship and subsequently for the fulfillment of legal obligations, may be communicated to any business partners, subsidiaries and affiliates of the Controller, to consultants of the latter within the limits necessary for the performance of their duties at the Company, producers, distributors, suppliers of the Proprietor within the limits necessary for the performance of the activities covered by contractual relationships and / or requests of the concerned party, transport companies for shipments of goods and customs procedures, banking institutions for the management of payments, financial administrations and public bodies in fulfillment of regulatory obligations, companies and law firms for the protection of contractual rights, competent judicial and investigative authorities in case of express request by the Authorities themselves, to the persons authorized for processing and, for the purposes indicated above, to external collaborators, to entities operating in the fields of privacy or IT, to the contractual counterparts and their respective defence attorneys and, in general, to all those subjects to whom communication is necessary for the correct fulfillment of the aforementioned purpose.

art. 6 Possibility of transferring personal data to third countries

The data controller may transfer personal data to third countries that guarantee an adequate level of protection pursuant to art. 45 of EU Regulation 2016/679 or to other third countries where the transfer of data is necessary for the execution of the contract concluded between the concerned party and the data controller or the execution of pre-contractual measures taken at the request of the concerned party pursuant to art. 49 of the aforementioned EU Regulation.

art. 7 Right of Access to personal data and complaint procedures:

It is hereby specified that, with reference to the personal data provided, the following rights may be exercised pursuant to Arts. from 15 to 22 of EU Regulation 679/2016 and of the Privacy Code - Legislative Decree 196/2003 and 101/2018 (in compliance with the legislation of EU Reg. 679/2016):

- ask the data controller to access personal data, correct or delete them or limit their processing. The corrections, deletions or limitations of the processing performed at the request of the concerned party, unless this proves impossible or involves a disproportionate effort, will be communicated by the data controllers to the recipients who have been transmitted personal data (Article 15, 16, 17, 18 EU Regulation 679/2016);
- oppose in whole or in part:
 - a) for legitimate reasons, the processing of personal data, even if pertinent to the purpose of the data collection;
 - b) the processing of personal data for the purpose of sending advertising material or for carrying out market surveys or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and / or through traditional marketing methods by telephone and / or post.

Please note that the right to object of the concerned party, set out in the previous point b) for direct marketing purposes by automated means, extends to traditional means and in any case the concerned party may even partially exercise the right to object. Therefore, the concerned party can decide to receive only communications through traditional means or automated communications or neither of the two types of communication (Article 21 EU Regulation 679/2016);

- data portability as governed by art. 20 of EU Regulation 679/2016;
- revoke consent at any time without prejudice to the lawfulness of the data processing based on the consent given without the revocation (it is noted that the right of withdrawal of consent clearly cannot apply to cases in which the data processing, for example, is necessary to fulfil a legal obligation to which the data controller is subject or for the performance of a task of public interest or in connection with the exercise of public authority vested in the data controller (Article 7 EU Regulation 679/2016);
- lodge a complaint to the Guarantor for the protection of personal data, following the procedures and instructions published on the official website of the Authority (Article 77 EU Regulation 679/2016);

A copy of the personal data being processed can be requested by contacting the data controller's offices or sending the respective request to the email address **privacy@calpower.it**

The data controller can also be asked through the aforementioned mailbox, to rectify or delete personal data, to object to their processing or to request their limitation (all consistent with the purposes of the same data processing).

The exercise of the rights referred to in the preceding points is not subject to any form of constraint and is free of charge.

The Data Controller is required to provide an answer within one month of the request, extending up to three months in the case of requests of particular complexity.

art. 8 Data controller and persons responsible for processing:

The Data controller, pursuant to art. 13 co. 1 let. a) of EU Regulation 679/2016 is **CalPower Srl** based in Via Acquanera 29, Como (CO) - VAT number 03186750133, in the person of the legal representative.

The list of data processors and of any responsible persons is retained at the headquarters of the data controller and made available at the request of the concerned party.

For rapid, direct and effective communication with the data controller, please use: tel. +39.031.526.566, email **privacy@calpower.it**