

PRIVACY POLICY (extended)

Pursuant to Clauses 13 and 14 of the GDPR

Web site, app and portal
Clients and users
CV and job application
Meeting, events, trade shows
Sales agent and broker
Consultant, professional and freelancer
Marketing and newsletter
Supplier

Notice and received requests

Why is this document important?

This document is for you important because it inform you about how and why we treat your personal data (9)

Important means that you will find the explanation of the word that come before it in the essential glossary at the back! This notice concern only Personal data whose processing purpose are specified below (why we process your personal data).

This notice does not replace the other specific information that you will receive in the context of using other services from The Data Controller. The present notice can be modified over time: for that reason, we encourage you to review it periodically.

The Data Controller

Essepi S.r.l., C.F. 01917380303, P.I. IT 01917380303, Castions di Strada (UD) Via A. Malignani n. 2 privacy@essepiwood.it | O www.essepiwood.it

Your rights

In cases provided by law, you have the rights to access, correct, remove or object your collected personal data; you also have the right to portability where technically possible.

You have the right to revoke your consent granted to the Data Controller, without prejudice to the lawfulness of processing based on the consent given before the withdrawal.

In any case, if you have doubts or requests, contact us (we will be pleased to hear you! Important As Data Subject, you can exercise your rights and revoke your consent by informing us at the indicated addresses. You can also lodge a complaint with the Data Protection Authority or contact the court if you believe that the processing of your data is contrary to law.

Why are we able to process your data (legal grounds for processing)?

Every single personal data treatment must be grounded in a suitable legal basis.

Important

The processing is lawful when

- contract: it is necessary to execute the contract with the data subject or the related pre-contractual measures required by the data subject
- consent: the consent of the data subject must be free, specific, informed and give by an unequivocal act

- Legal obligation: it is necessary to comply with a legal obligation to which the Data Controller is subject
- Lawful interest: it is necessary to pursue the lawful interest of the Data Controller or of third parties
- Safeguarding of vital interests: it is executed to preserve serious and current dangers to the life of the Data Subject
- Public interest: it is necessary for the performance of a task carried out in the public interest.

Why do we process your data (purpose)?

Communications and received requests

Manage the communications and the received requests

The Data Controller process your personal data with the purpose of manage the received requests (made in person, by e-mail or other communication tools provided, for example contact form, or phone calls, on line platforms, video conference).

Legal foundation: contract of legitimate interest

Important

The data communication for this purpose is necessary: if you do not provide us the data, we won't be able to answer you.

Lawful interest

Pursue a legitimate interest

Data subjects often have to be processed in order to carry out tasks related to business activities, but are not mandatory by law or under the existing contract between the parties. This refers in particular to actions to protect the company's assets; verify the quality of the work done by the company; check regulatory compliance; prevent fraud; do direct marketing; transfer intragroup data for administrative purposes; recover business claims; handle any disputes; exercise or defend rights in question or before taking action.

Legal foundation: legitimate interest

Important

We never process your data on the basis of legitimate interest if this can affect your rights and freedoms!

Obligations related to what we do

To comply with reasonably related contractual and regulatory obligations related to the business activity.

The Data Controller processes the data to perform activities connected and instrumental to the performance of the contractual and pre-contractual relationship with third parties (for example: administrative, managerial, fiscal and accounting formalities; managing correspondence; to make estimates; to receive orders; to arrange appointments; to inform on the state of the activity; to manage payments and invoicing).

Legal foundation: contract | legal obligation | lawful interest

Important

The communication of data for this purpose is essential

The processing for this purpose is carried out on the legal basis of legitimate interest and legal obligation, so your consent is not required.

Comply with the law

Fulfilling the legal obligations

The Data Controller also processes the personal data of the Data Subjects in order to fulfil the legal obligations (such as administrative, accounting and fiscal obligations) to which it is subject, to protect its rights, to allow the exercise of the functions of the courts

Legal foundation : legal obligation

Important

The communication of data for this purpose is essential

The processing for this purpose is carried out on the legal basis of the legal obligation, so your consent is not required.

What kind of data do we process?

Personal data

We process all information concerning an identified or identifiable natural person.

Important

Your data is valuable: do not disclose data that is not necessary for your request to us and do not disclose third party data unless you have their consent to do so!

We may also learn about your particular data that you voluntarily share with us (such as: health, genetic or biometric data; trade union membership; political opinions; philosophical or religious beliefs; ethnic or racial origin; life and sexual orientation).

Examples of personal data we process.

identification data and contact details: name and surname; tax code; place and date of birth; nicknames; telephone number, e-mail, residence, domicile, headquarters; username and password to access the systems that the Data Controller makes available to the Data Subject (business devices; e-commerce and private areas; Sites and apps)

Where do we find your data (sources)?

We process data that you share with us directly (optionally, explicitly and voluntarily) using various channels (such as when you call or write to us, when you interact with our social profiles or when you use our site or app) and data that you have made public.

We also process data in public registers, lists and other public sources (for example financial statements and other information from the Register of Companies at the Chambers of Commerce; real estate

deeds, registration of mortgages and other prejudicial acts; mass media and websites accessible by anyone).

We process data that we collect from third parties, that you have appointed yourself (for example those who ask us for a service on your behalf) or that we or others (such as commercial information

companies, external companies that perform market research, etc.).

Who do we share your data with?

We share the data with the internal members of our organization, following the assigned tasks, and specifically members in charge of the processing (such as: employees and associate employees; interns, volunteers, temporary workers; associates, investors, directors; consultants and collaborators).

We may share your data with third parties outside our organization who help us do our work and achieve the stated purposes. These subjects operate as independent owners or as external data processors: contact us ([ZEPOO]) if you want to know who they are!

The data will not be disclosed

Public Administrations, Public Entities and subjects, also private, with functions of public importance (such as Municipalities, ASL, INAIL, INPS, Finance Police, Supervisory Authority, Revenue Agency, Judicial Authority, etc.), in so far as the conditions laid down by the legislation are met, entities that manage the operation of the website, apps and in general the IT systems and corporate telecommunications networks (for example: web agencies; cookie providers and other tracking tools; newsletter providers; software houses, web providers; hosting providers)

How long do we keep your data?

We take the appropriate security measures to protect your data and do the processing (9) provided by law: collection, registration, organization, storage, consultation, processing, use, modification, selection, extraction, limitation, communication, deletion and destruction of data.

Transfer of data abroad

The Data will not be transferred to non -EU countries.

Essential glossary

Personal data: any information relating to an identified or identifiable individual;

Dissemination: giving knowledge of the data to indeterminate subjects, in any form, including through their availability or consultation. For example: publication of a photo online or on a social network

DPO. Data protection officer, liaising with Data Controller and Data Subject)

Data subject: The identified or identifiable living individual to whom personal data relates.

Data controller: it is a person, company, or other body that determines the purpose and means of personal data processing

Processing: any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data.