

**ADVISORY NOTE**  
**for processing the personal data of customers and suppliers**  
**pursuant to articles 13 and 14 of EU Regulation 679/2016**

Dear Customer or Supplier,

With regard to the personal data you have sent us, we hereby inform you of the following:

**1) Data Controller**

The Data Controller is Lucefin S.p.A. Via Ruc, 30 --25040 Esine (BS) - Italy, in the person of the legal representative *pro tempore* contactable at Tel. +39 0364 36 76 11 - Fax +39 0364 46 67 13.

**2) Purposes of the processing**

Personal data is collected for the following purposes:

- 1) to fulfil pre-contractual and contractual obligations;
- 2) to fulfil the obligations set by the provisions on health and safety at work, civil law, tax law, accounting law and, more in general, to fulfil the obligations connected to executing an agreed contract;
- 3) to manage any disputes or complaints;
- 4) to manage any audits or inspections of the company or the company's offices, including any companies controlled by us, any parent companies or companies in which an investment has been made;
- 5) to determine any line of credit, including for the purposes of stipulating a credit insurance policy and budget preparation;
- 6) to send informative newsletters from the company or from any parent company, subsidiary or company in which an investment has been made, regarding the services and products supplied.

**3) Legal basis**

The legal basis for processing personal data is linked to fulfilling the obligations to execute an agreed contract, as well as being connected to fulfilling any tax obligations, administrative obligations or, in any case, any obligations imposed by law or by the company's regulations.

For the purposes referred to in point 6, above, it is legitimate for the company to carry out marketing activities and activities to update the data subject on other events being carried out with the data subject's consent.

**4) Recipients**

Personal data which is subject to the processing in question will be sent:

- to collaborators, consultants, employees and service providers within the context of their respective duties, to fulfil contractual obligations and regulatory obligations (for example, regarding health and safety, the environment, privacy, Italian Legislative Decree 231/01);
- to parent companies, subsidiaries and companies in which an investment has been made when the communication of such personal data is necessary for the purposes given above;
- to post offices, shippers, couriers to send documentation and/or materials;
- to Public Administration offices for them to carry out their institutional functions, within the limits established by law and by regulations;
- to the Supervisory Body in order to comply with the controls required by Italian Legislative Decree 231/01.

**5) Transferring data overseas**

The data will be not transferred overseas.

**6) Data retention**

The data will be kept only for the time necessary to fulfil the contractual obligations and the purposes indicated and, therefore, until the contractual relationship has been terminated and, subsequently, for the time during which the company is subject to data retention obligations for tax and administrative purposes, or for any other purposes as required by law or by regulations.

**LUCEFIN S.p.A.**

Via Ruc, 30  
I-25040 Esine (BS)  
Tel. +39 0364 36 76 11  
Fax + 39 0364 46 67 13

PI, CF e Reg. Impr. BS 01535340986  
R.E.A. BS 319721  
Cap. Soc. € 6.240.000,00 i.v.  
www.lucefin.com | info@lucefin.com | lucefin@legalmail.it



## 7) The Data Subject's rights

You, being the data subject, have the right:

- to obtain confirmation, or otherwise, of the existence of personal data that concerns you, even if not yet recorded, and the communication, in an intelligible form, of the same data and its origin, including the purposes for and the means of processing and the logic applied in the case that the processing is carried out by electronic instruments;
- to obtain the deletion, transformation into anonymous form or the block of the personal data for which conservation is not necessary in terms of the reasons for which the data was collected and processed;
- to obtain the updating, correction and integration of your personal data;
- to oppose, in whole or in part, for legitimate reasons, the processing of the personal data that concerns you, even if pertinent to the reason for which the data was collected;
- to request and to obtain from the Data Controller – in the cases in which the legal basis for processing is either contractual or consensual and is done by automated means – a copy of your personal data in a structured format that can be read by an automated device, including for the purposes of sending this data to another data controller (the so-called right for the personal data to be portable);
- to revoke at any time any consent you may have previously given, limited to the cases in which processing is based on your consent for one or more specific purposes and concerning common personal data (for example, date and place of birth or place of residence), or particular categories of data (for example, data that concerns your racial ethnicity, your political views, your religious convictions, your state of health and your sexual preferences). Processing based on consent and performed up to the point at which you revoke your consent, remains, however, legitimate;
- to lodge a complaint with the Supervisory Authority (which, in Italy, is the Italian Data Protection Authority [*Autorità Garante per la protezione dei dati personali* – [www.garanteprivacy.it](http://www.garanteprivacy.it)]).

## 8) Mandatory or optional nature of providing your personal data

Providing your personal data for the related processing is mandatory for the purposes described in points 1 to 5, above, since this data is needed to fulfil the obligations deriving from the agreed contract and to respect the regulations regarding health, safety and the environment. Any refusal to provide this data, in whole or in part, will make it impossible for this company to execute the agreed contract and to properly carry out all its obligations. Consent for the purposes described in point 6, above, is optional and you may, therefore, decide to deny, at any time, the use of your data for this sort of processing.

LUCEFIN S.p.A.

Via Ruc, 30  
I-25040 Esine (BS)  
Tel. +39 0364 36 76 11  
Fax + 39 0364 46 67 13

PI, CF e Reg. Impr. BS 01535340986  
R.E.A. BS 319721  
Cap. Soc. € 6.240.000,00 i.v.  
[www.lucefin.com](http://www.lucefin.com) | [info@lucefin.com](mailto:info@lucefin.com) | [lucefin@legalmail.it](mailto:lucefin@legalmail.it)

