PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA – CONTACT FORM AND NEWSLETTER

Pursuant to Article 13 of EU Regulation 2016/679

GMA s.r.l. – VAT No. 03017070982 – in its capacity as Data Controller (hereinafter the "**Data Controller**"), wishes to provide you, through this document, with detailed information regarding the use and protection of your personal data.

Purposes, legal bases and data retention periods

With regard to the **purposes**, your personal data, provided by you through this form, will be used to:

a) Respond to questions, messages and requests for information submitted by the data subject through the contact form;

b) Send you promotional and commercial communications concerning the activities, services and events organised by the Data Controller.

With regard to the **legal basis**:

a) for the purpose referred to under letter a), the legal basis is found in Article 6(1)(b) of EU Regulation 679/2016 (*performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract*).

b) for the purpose referred to under letter b), the legal basis is found in Article 6(1)(a) of EU Regulation 679/2016 (*the data subject has given consent to the processing of his or her personal data for one or more specific purposes*).

With regard to the **retention periods**:

a) for the purpose referred to under letter a), the Data Controller will retain your data for the time necessary to deal with your request for information, and in any event for no longer than 12 months from your request, after which your data will be deleted, unless further processing needs arise in connection with existing or future relationships, such as service relationships (for the management of which reference is made to the specific notice that will be provided by the Data Controller), or in connection with requests from the Authorities.

b) for the purpose referred to under letter b), in accordance with the guidelines and measures issued by the Italian Data Protection Authority (Garante per la protezione dei dati personali), the personal data collected for this purpose will be processed for 24 months from the last significant interaction between the Data Controller and the data subject, unless the data subject withdraws consent at an earlier date.

Data subject to processing

The data that we have requested from you, and that will be subject to processing activities for the purposes set out above, can be described as follows:

- **Contact details**: (e-mail address) – (mandatory);
- **Text message** (where it includes further personal data not requested by the *form*) – (mandatory);
- **Identification data**: (surname, first name, company) – (mandatory); telephone number (optional).

For your protection, please note that only the data strictly necessary for carrying out the purposes described above are processed, in compliance with the **data minimisation principle** set out in Article 5(1)(c).

Methods of processing

With regard to the methods of processing, we inform you that your data may be processed both manually and electronically, in compliance with Article 32 of EU Regulation 2016/679, by the Data Controller or by persons specifically appointed and authorised by the Data Controller, including, where applicable, the functions involved in receiving, examining and assessing reports.

The updated list of authorised persons and of external parties appointed as Data Processors is kept at the Data Controller's registered office, and the Data Controller will promptly make it available upon your express request.

Pursuant to Article 4(2) of the Regulation, it is specified that processing may consist of any operation or set of operations such as collection, recording, storage, adaptation or alteration, retrieval, consultation, disclosure, restriction, erasure or destruction.

Disclosure of data

In order to pursue the purposes described above, your data will be known to the employees, equivalent staff and collaborators of the Data Controller, who will act as persons authorised to process personal data.

Your personal data may be the subject of simple disclosure in order to comply with justified requests from the Authorities, or with laws, regulations and/or EU legislation.

Images will not be disclosed to third parties, except where it is necessary to comply with a specific and justified investigative request from the Authorities.

Transfer of personal data outside the EEA

The Data Controller does not intend to transfer your personal data outside the European Union.

Should this become necessary for technical or organisational reasons, any such transfer will in any case be preceded by a prior assessment of the existence of the lawfulness conditions and of the adequate safeguards required under Articles 44 et seq. of the GDPR. In such circumstances, you may request information from the Data Controller regarding the transfer of your personal data outside the European Union and obtain a copy of the protective measures adopted, by submitting a specific request to the Data Controller at the addresses indicated below.

What your rights are and how to exercise them

As a data subject, with regard to the processing described in this notice, you are granted the rights set out in Articles 15 to 22 of EU Regulation 2016/679, where applicable, namely:

- **right of access**: the right to obtain confirmation as to whether or not personal data concerning you are being processed and, where that is the case, to access your personal data – including a copy thereof – and the information referred to, among others, in Article 15 of the GDPR;

- **right to rectification**: the right to obtain, without undue delay, the rectification of inaccurate personal data concerning you and/or the completion of incomplete personal data pursuant to Article 16 of the GDPR;

- **right to erasure ("right to be forgotten")**: the right to obtain, without undue delay, the erasure of personal data concerning you, in the cases set out in Article 17 of the GDPR;

- **right to restriction of processing**: the right to obtain the restriction of processing, in the cases set out in Article 18 of the GDPR;

- **right to withdraw consent** at any time, without affecting the lawfulness of processing based on consent given prior to its withdrawal;

- **right to lodge a complaint** with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali), Piazza Venezia n. 11, 00187, Rome, Italy.

The above rights may be exercised against the Data Controller by contacting the details indicated at the bottom of this notice. The Data Controller will take charge of your request and will provide you, without undue delay and in any event within one month of receipt of the request, with information on the action taken in response to your request.

The exercise of your rights as a data subject is free of charge pursuant to Article 12 of the GDPR; however, in the case of manifestly unfounded or excessive requests, including by reason of their repetitive nature, the Data Controller may charge a reasonable fee, taking into account the administrative costs incurred in handling the request, or may refuse to act on the request.

Finally, we inform you that the Data Controller may request further information necessary to confirm the identity of the data subject.

Contact details: info@gma.it

The appointed Data Protection Officer (DPO) is Frareg s.r.l., who may be contacted at **dpo@frareg.com**