

INFORMATION DOCUMENT

pursuant to article 13 of Regulation (UE) 2016/679 of the European Parliament and of the Council dated 27 April 2016

Pursuant to article 13 of the General Data Protection Regulation - Regulation (UE) 2016/679 of the European Parliament and Council dated 27 April 2016 relating to the protection of natural persons with regard to the processing of personal data and the free movement of such data (hereafter "GDPR"), and our attention in furnishing you information related to the processing of personal data supplied by you for aims of the relationship with B.T.V. S.p.A.

Data Controller
The Data Controller is B.T.V. S.p.A. with registered offices at Vicenza (VI), Via Luca della Robbia No. 25, tax code and registration number with the Companies' Register of Vicenza: 03277970244 (hereafter "data controller" or "Company") being part of the "Battistolli Group".
Data Protection Officer (hereafter "RPD" or "DPO")
The contact data for the DPO is available on the Data Controller's web site or from the registered offices. In order to exercise your rights and for all communications, problems and/or requests for clarifications regarding the protection of your personal data, you may freely contact the DPO.

Obligatory purposes for which processing does not require your consent

Purposes	Legal basis for processing
Managing the filing and preservation of data, the sending of information and communications, even electronic, requested by you through the company web site, the sending of documents regarding the relationship with the Company.	(Article 6, para 1, sub-para c, GDPR) Processing necessary for fulfilling a legal obligation to which the data controller is subject (Article 6, para 1, sub-para f, GDPR) Processing necessary for pursuance of the legitimate interests of the data controller connected with the organisational and commercial management of his organisation.

Discretionary purposes for which processing requires your consent

Purposes	Legal basis for processing
Statistics, commercial, promotional and marketing activities with the supply of materials and information on new products, promotions, discounts, benefits and other services of interest to you from the data controller, even with the sending of appropriate material in paper and/or electronic format, by means of a newsletter (e-mail, SMS, MMS, instant messaging); the sending of information and invitations to events organised or sponsored by the Company.	(Article 6, para 1, sub-para a, GDPR)

Addressees of personal data

For pursuance of the above-mentioned aims, your personal data could be communicated to:

- Employees and/or colleagues of the data controller, duly nominated as persons authorised and trained on the manner of processing such data;
- other companies of the Battistolli Group for the management of specific functions and/or services;

- third parties differing from the data controller, such as:

Third party persons or categories	Purposes	Notes
Computer companies	Management, maintenance, updating of systems and software used by the Data Controller	Nomination as Data Processor (article 28, GDPR). Information held by the DPO
Suppliers of networks, electronic communications services, computer and electronic archiving services, preservation and computer management of data	Hosting, housing, Cloud, SaaS and other indispensable remote computer services for the provision of the data controller's activities; regulatory archiving and preservation services of electronic documents	Nomination as Data Processor (article 28, GDPR). Cloud services could involve processing of data in countries outside the EU which guarantee suitable confidentiality rights. Information held by the DPO
Consultants, professionals, legal offices, arbitrators, insurance, consultants, brokers	Judicial and non-judicial activities, those for insurance against accidents Organisational, administrative, financial and accounting management	Nomination as Data Processor (article 28, GDPR). Information held by the DPO

The companies of the Battistolli Group and third parties to whom your personal data might be communicated act as:

- Data controllers, or persons determining the purposes and means of processing personal data;
- data processors, or persons who process personal data on behalf of the data controller;
- joint processing controllers who determine the purposes and means of the same, jointly with the company.

The list of, and updated, information on the individuals identified as data controllers, processor or joint controllers is available from the company.

Period of preservation of personal data

Note below the statement on the period of preservation of personal data or, if not possible, the criteria used for determining the period.

Personal data and documents	Period of preservation or the criteria for determining it.
Records and documents relating to the contractual relationship with the Company	For the necessary duration of pursuing the purposes of processing and also, subsequently, within the limits allowed in law, for administrative and accounting purposes, in addition to validating or safeguarding the rights of the data controller, where necessary

Rights of the interested party

We inform you of the existence of a number of rights set out in the GDPR relating to personal data and related processing, which you may request of the data controller.

Right	Description	Manner of making it effective
Right to rescind approval	You have the right to rescind the agreement to processing for which it was required, without prejudicing the	Forms available from the data controller's web site

(article 13, para 2, sub-para c)	legality of the processing based on the agreement before the revocation	
Right of access to the data (article 15)	You may request: a) the purpose of the processing; b) the categories of personal data in question; c) the addressees or the categories of addressee to which the personal data has been, or will be, communicated, in particular if the addressees are of third party countries or international organisations; d) where possible, the forecast period of preservation of personal data or, if that is not possible, the criteria used to determine such a period; e) the existence of the interested party's right to require of the Data Controller the correction or cancellation of personal data or a limitation on the processing of personal data which concerns you or of which you oppose the processing; f) the right to place a complaint with a supervisory authority; g) whenever the data has not been gathered from the interested person, all the available information on its source; h) the existence of an automated decisional process, including the profiling referred to in article 22, paras 1 and 4, and, at least in such cases, significant information on the logic used, as well as the importance and the consequences foreseen on such processing for the interested party. You have the right to request a copy of the personal data, subject of processing	Forms available from the data controller's web site
The right to correction (article 16)	You have the right to request a correction of incorrect personal data which concern you and of obtaining the integration of incomplete personal data.	Forms available from the data controller's web site
Right of erasure (article 17)	You have the right to obtain the cancellation of personal data concerning you from the data controller if the personal data is no longer necessary with regard to the purpose for which it was gathered or otherwise processed	Forms available from the data controller's web site
Right to limitations on processing (article 18)	You have the right to obtain from the data controller limitations to the processing on contesting the exactness of the personal data (for the period necessary to the data controller to verify the exactness of the said personal data) or, if the processing is unlawful but you oppose the cancellation of the personal data and request that its use be limited, or if required by you for confirming, implementing or defending the right to address the matter in law while they are no longer necessary to the data controller.	Forms available from the data controller's web site
Right to data portability (article 20)	You have the right to receive the personal data concerning you supplied to us in a structured format, commonly usable and legible on an automatic device, and also have the right to transmit them to another data controller if the processing: (i) is based	The right may be implemented by opening an appropriate procedure with the data controller

	on the agreement (ii) or the contract and (iii) if the processing is carried out by automated means, with the exception that the processing is necessary for execution of a duty of public interest or connected with the exercising of public powers and that such a transmission does not impinge on the rights of a third party.	
Right to objection (article 21)	You have the right, at any moment, to object, as a whole or in part, to the processing of your personal data whenever the treatment is carried out for the pursuance of a legitimate interest of the data controller or whenever the processing is carried out for direct marketing purposes.	Forms available on the controller's web site
Right to bring an action with the Supervisory Authority (article 77)	You have the right to lodge a complaint with a supervisory body whenever you consider that the processing violates the GDPR.	

The exercising of the above-mentioned rights is subordinate to the limits, the rules and procedures set out in the GDPR and which the Interested party must know and implement. Furthermore, along with the provisions of article 12, para 3, the data controller will supply the interested party with the information relating to the action taken without unjustified delay and, in any case, not later than one month from receipt of the said request. If necessary that period may be extended to two months, depending on the complexity and number of requests. The Data Controller will inform the interested party of such a delay, along with the reasons for it, within one month of receipt of the request.

The personal data submitted may be processed by the data controller with or without the use of computer facilities.

Furthermore, we inform you that the communication of your personal data for the obligatory purposes indicated is a legal or contractual obligation, or a necessary requirement for the conclusion of a contract, for which, you are required to furnish the personal data as, failing that, it will not be possible to manage the relationship with the Company.