

## **Privacy Policy – Support Form**

### **Information pursuant to article 13 Reg. EU 2016/679 (GDPR) to those getting in touch with Grafikontrol through the Support Form**

The user will find described in this section how the personal data provided by the user, by filling in the support form (“Support Form”) on the website [www.grafikontrol.it](http://www.grafikontrol.it) owned by Grafikontrol S.p.A., will be processed.

#### **1. Data Controller website**

The Data Controller of the personal data collected through the [www.grafikontrol.it](http://www.grafikontrol.it) is Grafikontrol S.p.A., having its registered address at Via Ludovico D’Aragona 7, 20132 Milan, VAT number 00796010155, phone number +39 02 2100951, certified electronic mail [grafikontrol@pec.grafikontrol.it](mailto:grafikontrol@pec.grafikontrol.it), in the person of its legal representative (hereafter the Data Controller).

#### **2. Data collected with the Support Form**

By filling in the Support Form the user:

- selects the type of assistance she/he wishes by choosing between the option “on site” or “remote”;
- discloses the name of the company;
- discloses her/his name; discloses the email address and phone number where to be contacted;
- discloses the Grafikontrol job order;
- indicates the object of the message;
- writes a message indicating the reason he/she wishes to be contacted

The message will be automatically sent to [helpdesk@grafikontrol.it](mailto:helpdesk@grafikontrol.it).

Grafikontrol will not receive the user’s message if this latter does not consent to the collection of the data in the Support Form.

#### **3. Purposes of the data processing**

The personal data indicated by the user when filling in the Support Form and the information provided by the user in the message sent are processed by the Data Controller:

A) for the purposes indicated in the user’s message, pursuant to the user’s consent (article 7 GDPR);

B) without the user’s additional express consent (article 6 par. b) and c) GDPR), for the following Commercial Purposes:

- to fulfil the pre-contractual, contractual and tax obligations deriving from the current relation between the user and the Controller;
- to fulfil the obligations deriving from national and European Union laws and regulations or from an order of a Public Authority (e.g. in the matter of anti-money laundering);

- to exercise the Data Controller's rights, for example the right to judicial defense;
- C) without the user's additional express consent (article 130 par. 4 Privacy Code and article 6 lett. f) GDPR), save in the case of an explicit dissent (pursuant to article 130 par. 4 Privacy Code and article 21 GDPR), that the user may express at any time, easily and at no charge, giving notice thereof to the Data Controller, by registered post to the address Via Ludovico D'Aragona 7, 20132 Milan, or, alternatively, by electronic mail to [privacy@grafikontrol.it](mailto:privacy@grafikontrol.it), for the following Promotional Purposes:
- to send to the user by email commercial communications and advertising materials concerning products and services of the Data Controller of the same kind as those which the user already enjoyed, including invitations to exhibitions attended by the Data Controller.

#### **4. Way of processing**

The processing of the personal data collected through the Support Form will be carried out in conformity with the principles of fairness, lawfulness, necessity and by means of the operations listed in art. 4, par. 2) GDPR and, namely: collection, recording, organization, storage, consultation, elaboration, modification, selection, extraction, comparison, use, interconnection, blocking, disclosure, erasure and destruction of data. The personal data will be processed either on paper or electronically.

#### **5. Duration of data storage**

The Data Controller will process the personal data for the time strictly necessary in order to fulfil the purposes listed above and in any case for a maximum period of 10 years from the end of the relationship with regard to Commercial Purposes and for a maximum period of 4 years for Promotional Purposes. At the end of the storage period the data will be erased.

#### **6. Access to data**

The data may be made accessible for the purposes listed in paragraphs 3.A) and 3.C):

- to employees and collaborators of the Data Controller in Italy for the carrying out of their respective tasks with regard to the commercial relationship.

The data may be made accessible for the purposes listed in paragraph 3.B):

- to employees and collaborators of the Data Controller in Italy for the carrying out of their respective tasks with regard to the commercial relationship.

- to third party companies or other subjects in Italy and abroad (e.g. professional firms, consultants, credit institutions, insurance companies for the rendering of insurance services, etc.) which perform business activities in the interest of the Data Controller or which have a commercial relationship with the Data Controller.

#### **7. Disclosure of data**

The Data Controller, without need of a user's express consent (article 6 par. b) and c) GDPR) may disclose the user's personal data for the purposes listed in paragraph 3.B) above to the following subjects:

Tax Authority (Agenzia delle Entrate), controlling authorities (such as IVASS), judicial authorities, insurance companies for the rendering of insurance services, as well as to those other subjects to whom disclosure of the data is mandatory for the mentioned purposes.

These subjects will process the data in their capacity as autonomous data controller.

## **8. Data transfer**

The personal data are stored on servers located in Italy and thus within the European Union. In any case, the Data Controller, if necessary, may relocate the servers even outside the European Union. In such case, the Data Controller shall ensure that the transfer of data outside the European Union will be made in accordance with the provisions of the applicable laws. The users' personal data may be processed by other subjects acting on behalf of Grafikontrol S.p.A., in European Union member states or in countries outside the European Union, within the scope and limits provided for by article 45, 46 and 47 GDPR.

## **9. Nature of the communication of data and consequences of denial**

The communication of personal data and the consent for the purposes of article 3.A) are mandatory; the failure to fill in the Contact Form with the personal data referred to in point 2 and to provide such a consent prevents the sending of the message to Grafikontrol.

The communication of personal data and the consent for the purposes of article 3.B) are mandatory; in their absence, Grafikontrol will not be able to establish/continue the commercial relationship.

The communication of personal data and the consent for the purposes of article 3.C) are not mandatory. In such a case, the lawfulness of the processing is based on the Data Controller's interest to keep a communication-commercial channel with the user, respecting the user's right to oppose processing for such purpose. Pursuant to article 130 par. 4 Privacy Code and article 12 GDPR, the user may express his/her dissent, at any time, easily and at no charge, notifying thereof in writing the Data Controller, by registered post to the address Via Ludovico D'Aragona 7, 20132 Milan, or, alternatively, by email to [privacy@grafikontrol.it](mailto:privacy@grafikontrol.it). In such case, the user will not receive by email any commercial communication and/or advertising materials concerning services of the Data Controller of the same kind as those which the user already enjoyed, including invitations to exhibitions attended by the Data Controller.

## **10. Rights of the data subject**

Being a data subject, the user is entitled to the rights provided by articles 15- 21 GDPR (in brief, right to access, right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object) and, more in details, the right:

- i. to obtain confirmation as to whether or not personal data concerning the user exist, even if not recorded yet, and their disclosure in intelligible form;

- ii. to obtain the indication of: a) the source and the categories of the concerned personal data; b) the purposes and methods of the processing; c) the logic applied in case of processing carried out in case of the existence of automated decision-making; d) the identity of the data controller or of the processor, if any; e) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in their capacity as representative designated in the territory of the State, as data processors or persons in charge of the data processing, in particular if recipients are in countries which are not members of the European Union or international organisations; f) when possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; g) where personal data are transferred to a country outside the European Union or to an international organisation, the existence of appropriate safeguards pursuant to art. 46 GDPR relating to the transfer;
- iii. to obtain: a) the update, the rectification or, if you are interested, the completion of the data; b) the erasure, transformation into anonymous form or the blocking of the data unlawfully processed, including data whose storage is not necessary to the purposes for which they were collected or subsequently processed; c) the attestation that the operations mentioned under a) and b) have been notified, including their contents, to those to whom the data were disclosed or disseminated, except for the case in which such a fulfilment is impossible or involves means clearly disproportionate to the relevant protected right;
- iv. to object, in whole or in part: a) for legitimate reasons, to the processing of your personal data , though relevant to the purpose of their collection; b) to the processing of your personal data for the purposes of sending advertising materials or direct selling or market research or commercial communication, through the use of automatic calling systems without the intervention of an operator, by e-mail and/or through traditional marketing by phone and/or mail. In any case, you have the possibility to exercise such rights only partially. Therefore, you may decide to receive communications only through traditional methods or only automatic communications, or none of the two types of communication.

The user also has the right to file a complaint with the Privacy Authority (Autorità Garante per la Protezione dei Dati Personali).

## **11. Modalities for the exercise of the rights**

User may at any time exercise the rights by sending either:

- a letter by registered post to Grafikontrol S.p.A., Via Ludovico D'Aragona 7, 20132 Milan  
or
- an email to the email address [privacy@grafikontrol.it](mailto:privacy@grafikontrol.it)

## **12. Data processors and Persons in Charge of the Processing**

The updated list of the Data Processors or Persons in Charge of the Processing with the personal data processing, if any, is kept in Grafikontrol S.p.A. and is easily accessible by sending an email to the following address: [privacy@grafikontrol.it](mailto:privacy@grafikontrol.it).