

Information on the processing of Customers' personal data

Marketing Purposes

Mr. Anthony Bianchi, in his capacity as Legal Representative of BDS69 S.r.l., with registered office in Via IV Novembre, 69 – 00043 Ciampino (RM) CF and VAT number 05764431002 (hereinafter, "Data Controller"), as data controller, informs you pursuant to Article 13 of Legislative Decree No. 196 of 30.6.2003 (hereinafter, "Privacy Code") and Articles 12, 13 and 14 of EU Regulation No. 2016/679 (hereinafter, "GDPR") that your data will be collected for the purpose of concluding the contract and will be processed in compliance with the aforementioned legislation in order to guarantee the rights, fundamental freedoms, as well as the dignity of natural persons, with particular reference to confidentiality and personal identity. We inform you that if the activities provided to you involve the processing of personal data of third parties, in your ownership it will be your responsibility to ensure that you have complied with the provisions of the law with regard to the Data Subjects in order to make their processing by us legitimate.

Your data will be processed in the following ways and for the following purposes:

Object of the Processing

The Data Controller processes personal identification data such as, for example: name, surname, company name, address, telephone, e-mail, tax code and/or VAT number, bank and payment references such as credit and debit cards provided as a guarantee and/or balance; hereinafter, "personal data" or "data", communicated by you when proposing offers, orders and concluding contracts for the services of the Data Controller.

Processing methods

The processing of your personal data is carried out by means of the operations indicated in art. 4 of the Privacy Code and art. 4 n. 2) GDPR and precisely: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, limitation, communication, deletion and destruction of data. Your personal data is processed both on paper and electronically and/or automatically.

Purpose of the processing

In compliance with current legislation on the protection of personal data and **without the need for specific consent from the Data Subject**, the Data will be stored, collected and processed by the Company for the following purposes:

- a) sending, directly or through third party providers of marketing and communication services, newsletters and communications for direct marketing purposes through email, sms, mms, push notifications, fax, paper mail, telephone with operator, in relation to products provided by other companies pursuant to art. 130 c. 1 and 2 of Legislative Decree no. 196/03 (hereinafter referred to as the "Code");

- b) communication of Data to third-party companies for the sending of newsletters and communications for marketing purposes through email, sms, mms, push notifications, fax, paper mail, telephone with operator pursuant to art. 130 paragraphs 1 and 2 of the Code.

The legal basis for the processing of personal data for purposes a) and b) is Art. 6.1.a) of the GDPR as **the processing is based on consent**. The provision of consent to the use of data for marketing purposes is optional and if the data subject wishes to object to the processing of Data for marketing purposes carried out by the means indicated herein, as well as to revoke the consent given; you may do so at any time without any consequence (except for the fact that you will no longer receive marketing communications) by following the instructions in the "Rights of the Data Subject" section of this Policy.

Finally, it should be noted that for the processing carried out for the purpose of directly sending its advertising material or direct sales or for carrying out its own market research or commercial communications in relation to products or services similar to those used by the Client, the Company may use e-mail or personal addresses pursuant to and within the limits permitted by art. 130, paragraph 4 of the Code and the provision of the Italian Data Protection Authority of 19 June 2008, even in the absence of explicit consent. The legal basis for the processing of data for this purpose is Art. 6, paragraph 1, letter f) of the GDPR, without prejudice to the possibility of objecting to such processing at any time, by following the instructions in the "Rights of the Data Subject" section of this Policy.

Communication

The data may be communicated to third parties appointed as data processors pursuant to Article 28 of the GDPR and in particular to banking institutions, companies active in the insurance field, suppliers of services strictly necessary for the performance of business activities, or to company consultants, if this is necessary for fiscal, administrative, contractual reasons or for needs protected by current regulations.

Your personal data, or the personal data of third parties in your ownership, may also be communicated to external companies, identified from time to time, to which BDS69 S.R.L. entrusts the execution of obligations deriving from the assignment received, to which only the data necessary for the activities requested will be transmitted. All employees, consultants, temporary workers and/or any other "natural person" who carry out their activities on the basis of the instructions received from BDS69 S.R.L., pursuant to art. 29 of the GDPR, are appointed as "Data Processors" (hereinafter also referred to as "Data Processors"). BDS69 S.R.L. issues appropriate operating instructions to the Persons in Charge or Data Processors, if any, in order to guarantee the confidentiality and security of the data. With reference to the aspects of personal data protection, the Customer is invited, pursuant to art. 33 of the GDPR to report to BDS69 S.R.L. any circumstances or events from which a potential "data breach" may arise in order to allow an immediate assessment and the adoption of any actions aimed at countering such event by sending a communication to BDS69 S.R.L. at the addresses indicated below.

The Data will not be disseminated.

This is without prejudice to BDS69 S.R.L.'s obligation to communicate data to Public Authorities upon specific request.

Moving abroad

The transfer of your personal data abroad may take place if it is necessary for the management of the assignment received. For the processing of information and data that may be communicated to these subjects, the equivalent levels of protection adopted for the processing of the personal data of their employees will be required. In any case, only the data necessary for the pursuit of the intended purposes will be communicated and the regulatory instruments provided for in Chapter V of the GDPR will be applied.

Methods, logic of processing and storage times

Your data are collected and recorded lawfully and correctly for the purposes indicated above in compliance with the principles and requirements of art. 5 c 1 GDPR.

The processing of personal data is carried out using manual, computer and telematic tools with logics strictly related to the purposes themselves and, in any case, in such a way as to guarantee their security and confidentiality.

Personal Data will be processed by BDS69 S.R.L. for the entire duration of the assignment and also subsequently to assert or protect its rights or for administrative purposes and/or to execute obligations deriving from the applicable pro tempore regulatory and regulatory framework and in compliance with specific legal obligations on data retention.

The Data Controller will keep the data for no more than 2 years from the collection of the data for Marketing Purposes.

Rights of the Data Subject

In accordance with, within the limits and under the conditions provided for by the legislation on the protection of personal data regarding the exercise of the rights of the Data Subjects, with regard to the processing covered by this Policy, as a Data Subject you have the right to request confirmation as to whether or not your personal data is being processed, access the personal data concerning you and in relation to them you have the right to request its rectification, the erasure, the notification of rectifications and cancellations to those to whom the data may have been transmitted by our Organization, the limitation of processing in the cases provided for by the law, the portability of the personal data - provided by you - in the cases indicated by the law, to object to the processing of your data and, specifically, you have the right to object to decisions concerning you if based solely on automated processing of your data, Profiling included. In the event that you believe that the processing of your data violates the provisions of the GDPR, you have the right to lodge a complaint with the Guarantor pursuant to art. 77 of the GDPR.

How to exercise your rights

You may exercise your rights at any time by sending:

- a registered letter with acknowledgement of receipt to the registered office of the Data Controller, Via IV Novembre, 69 – 00043 Ciampino (RM);
- an e-mail to info@bds69.com

BDS69 S.r.l.
Via IV Novembre, 69
00043 Ciampino (RM)
Email info@bds69.com | Tel: 0665010766
P.IVA 05764431002



Data Controller

Data Controller, pursuant to art. 4 of the GDPR, is BDS69 S.R.L., Via IV Novembre, 69 – 00043 Ciampino (RM) P.IVA: 05764431002 - CF: 05764431002

Responsible and authorized persons

The updated list of data processors and persons authorised to process data is kept at the registered office of the Data Controller.

Sincerely

The Data Controller

BDS69 S.R.L.