



PROMOSTAR S.r.l. wishes to inform you that Regulation (EU) 2016/679 ("GDPR") introduced a new regulatory framework for the protection of natural persons and other entities with regard to the processing of personal data. In accordance with the aforementioned legislation, such Processing will be carried out in compliance with the principles of lawfulness, fairness and transparency, and with due regard for confidentiality and the protection of rights, in accordance with the principles set out in Article 5 of the GDPR.

Pursuant to Article 13 of the GDPR, we therefore provide you with the following information:

DATA CONTROLLER	The Data Controller is PROMOSTAR S.r.l., with registered office at Via Casali Leoncini, 2/C - 33030 BUIA (Udine), Italy. The Controller may be contacted by email at info@promostar.it or by telephone on +39 0432 975752.
PERSONAL DATA PROCESSED	For the purposes of this notice, "Data" means personal data relating to natural persons processed by the Company for the establishment and performance of contractual relationships with its clients/suppliers. This includes, for example, the personal data of the legal representative of the company signing the contract on behalf of the client/supplier, as well as the employees/consultants of the client/supplier involved in the activities covered by the contract. The Company may also process special categories of personal data, in accordance with the legislation governing occupational health and safety. The Data may also include information concerning legal proceedings contained in public databases.
PURPOSES OF THE PROCESSING	• Purposes connected with the establishment and performance of the contractual relationship between our Company and the client/supplier; • Fulfilment of administrative and accounting obligations; • Compliance with obligations laid down by law, regulations, EU legislation or orders issued by competent authorities; • Establishing, exercising and/or defending the Company's rights in legal proceedings. • Sending communications by email, post, SMS and/or telephone, newsletters, commercial communications and/or advertising material relating to products or services offered by the Data Controller, as well as carrying out customer satisfaction surveys regarding service quality.
DATA RETENTION PERIOD	Personal data will be retained for the duration of the contractual relationship and, upon termination thereof, for a period of 10 years, or for such other period as may be required by the legislation in force from time to time. In any event, longer or specific retention periods required under applicable laws and regulations in the relevant sector, or necessary for the Company's defence in legal proceedings, shall remain unaffected. In the event of litigation, personal data will be retained for the entire duration of the proceedings until the expiry of all applicable limitation periods for appeals or legal remedies. For marketing communications, personal data will be retained for a period of two years following termination of the contractual relationship, or until you object to such processing. <i>Once the retention periods indicated above have expired, the data will be destroyed, erased or anonymised, insofar as this is compatible with technical deletion and backup procedures.</i>
LEGAL BASIS FOR PROCESSING	The processing activities are necessary for the performance of a contract, or for compliance with a legal obligation to which the data controller is subject. In any case, it is always possible to request that the Data Controller clarify the specific legal basis for each processing activity. Any marketing communications sent within the context of an existing B2B relationship, in accordance with the guidelines of the Supervisory Authority and as provided for by the recitals of the GDPR, fall within the legitimate interests of the Data Controller as soft spam.
PROVISION OF DATA	The provision of Data is mandatory insofar as it is strictly necessary for the fulfilment of the purposes described above. Failure to provide such Data will make it impossible to carry out and achieve the aforementioned purposes.
RECIPIENTS OF THE DATA	The Data may be disclosed to external parties acting either as independent Data Controllers or as Data Processors appointed by the Controller pursuant to Article 28 GDPR. These may include, by way of example, public bodies, public authorities, consultants and various service providers. The complete list of Recipients and Data Processors appointed by the Data Controller is always available at the registered office of the Data Controller.
PERSONS AUTHORISED TO PROCESS DATA	The Data may be processed by employees of the Company's departments responsible for pursuing the purposes indicated above, who have been expressly authorised to process such Data and have received appropriate operational instructions.

**TRANSFER OF
PERSONAL DATA**

Pursuant to Articles 44 et seq. of GDPR 2016/679, some of your personal data may be disclosed to recipients and Data Processors (the latter duly appointed by the Controller) established in non-European third countries, always in accordance with the principles of lawfulness, fairness, transparency and protection of your privacy.

**DATA SUBJECT
RIGHTS AND RIGHT
TO LODGE A
COMPLAINT**

With regard to personal data, the data subject may exercise the rights provided for under Articles 15 et seq. of the GDPR, namely:

Right of access (Article 15) - the right to obtain from the Data Controller confirmation as to whether or not personal data concerning them are being processed and, where that is the case, access to such data and to specific information relating to that processing, as set out in the aforementioned Article. **Right to rectification** (Article 16) - the right of the data subject to have their personal data corrected if inaccurate. **Right to erasure** (Article 17) - the right of the data subject to have their personal data erased where, for example, consent to processing is withdrawn, the purpose of the processing has been fulfilled, or the processing is unlawful. Naturally, it will not always be possible to comply with a request for erasure. This may be the case, for example, where the data are required to comply with a legal obligation or are necessary for the establishment, exercise or defence of legal claims. **Right to object** (Article 21) - The right to object to processing must be guaranteed where the legal basis for the processing is legitimate interest or the performance of a task carried out in the public interest. This right is also subject to limitations, as there may be cases in which the legitimate interests of the Data Controller prevail over those of the data subject. In such cases, it will be necessary to strike an appropriate balance. Processing may also be necessary for the performance of a task carried out in the public interest, or for the establishment, exercise or defence of legal claims before a court. **Right to data portability** (Article 20) - where processing is based on a contract or on consent, the data subject has the right, upon request, to receive their personal data in a structured, commonly used and machine-readable format (e.g. JSON, XML, CSV). This right applies only to data actively provided by the data subject and not to data inferred or derived. **Right to withdraw consent** (Article 7) - where the data subject has given consent to any processing activity carried out by the Data Controller, they may withdraw such consent at any time, without prejudice to any mandatory obligations arising under the legislation in force at the time the withdrawal request is made.

The data subject has the right to lodge a complaint with the competent Supervisory Authority in the Member State of their habitual residence, place of work, or where the alleged infringement occurred.

All of the above rights may be exercised by submitting a specific request to the Data Controller through the contact channels indicated in this Privacy Notice.