

AUTEL S.R.L.

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Privacy Policy concerning the processing of personal data pursuant to articles 13-14 of (EU) Regulation 2016/679

Data subject: Clients and Client Company Representatives

AUTEL S.R.L. in its capacity of Data Controller with regard to the processing of your personal data pursuant to (EU) Reg. 2016/679 (hereinafter the 'GDPR'), hereby informs you that the said regulation protects data subjects with regard to the processing of their personal data and that the said processing will take place in a fair, lawful, transparent manner which protects your privacy and your rights.

Your personal data will be processed in accordance with the terms of the above legal provisions and the confidentiality obligations contained therein.

Purpose and Legal Basis of Processing:

Specifically, your data will be processed for the following purposes related to the implementation of obligations pursuant to legal requirements:

- Mandatory legal obligations in the fiscal and accounting areas;
- Management of any complaints, litigation, and the exercise of the Data Controller's rights even in court (e.g., credit recovery, defense in court), suppression of illegal behavior.

Your data will also be used for the following purposes related to the execution of measures connected to contractual or pre-contractual obligations:

- Post-sale assistance;
- Management of access to the B2B portal;
- Management of relationships during sales operations;
- Quality management;
- Activity planning.

Your data will also be used for the following purposes necessary for the pursuit of the Data Controller's legitimate interest:

- Sending email communications to understand your opinion on a particular service, purchase, or order, in order to improve our services and customer experience in the future;
- Sending email communications of a commercial or promotional nature related to products and/or services similar to those already purchased or ordered previously.

Methods of processing: Your personal data may be processed in the following ways:

- Processing by means of electronic computers;
- Manual processing by means of paper archives.

Every processing operation is carried out in compliance with the methods provided for in Articles 6 and 32 of the GDPR and through the adoption of appropriate security measures provided.

Your data will be processed solely by personnel expressly authorized by the Data Controller and, in particular, by the following categories of authorized personnel:

- Staff members of company functions expressly authorized for processing and provided with appropriate operational instructions;
- Administration department.
- Sales Office.

Communication: Your data may be communicated to external parties for the correct management of the relationship, and in particular to the following categories of Recipients, including all Data Processors duly appointed:

- Subcontractors, including, but not limited to, ICT service providers and suppliers;
- Consultants and professionals, including those working in an associated form;
- Shippers, carriers, owners, postal services, logistics companies.

Dissemination: Your personal data will not be disseminated in any way.

Retention period: Please note that, in compliance with the principles of lawfulness, purpose limitation, and data minimization, pursuant to Article 5 of the GDPR, the retention period of your personal data is:

- For the purpose of verifying and exercising and defending a right in court, whose legal basis is the legitimate interest, the data will be retained for 10 years from the termination of the assignment, as provided by the ordinary statute of limitations (Article 2946 c.c.), unless further retention in the case of interruption or suspension of the statute of limitations;
- With reference to the sending of commercial communications via email related to products and/or services similar to those purchased by the data subject, data processing for this purpose is carried out without the data subject's consent, pursuant to and within the limits permitted by Article 130, paragraph 4 of Legislative Decree 196/2003 as amended by Legislative Decree 101/2018; the data subject has the option to oppose such processing at any time, initially or during subsequent communications, easily and free of charge by unsubscribing via the link provided in the received communications or by contacting the Data Controller as described in the privacy policy;
- Established for a period not exceeding the achievement of the purposes for which they are collected and processed for the execution and completion of contractual purposes.

Data Controller: the Data Controller, as defined by the Law, is AUTEL S.R.L. (VIA BAGNOLI, 9, 41049 SASSUOLO (MO), VAT No. 00963880364

You are entitled, by application to the Data Controller, to obtain the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to their processing, and in general to exercise all your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and disclosure of such data in intelligible form, and the right to lodge a complaint with the supervisory authority.
2. The data subject has the right to be informed of:

- a. the source of the personal data;
- b. the purposes and methods of processing;
- c. the logic applied if the data are processed by electronic devices;
- d. the identification data concerning the Data Controller, the Data Processors and the representative designated as per article 5, comma 2;

e. the entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data as designated representative in the State's territory, as data processors or as persons in charge of the processing.

3. The data subject is entitled to obtain:

- a. the updating, rectification or, where interested therein, integration of the data;
- b. the erasure, anonymization or blocking of data that have been unlawfully processed, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
- c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected;
- d. the portability of the data.

4. The data subject has the right to object, in whole or in part:

- a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.