

	<b>GDPR 02</b>	<i>NOTICE TO CLIENTS AND SUPPLIERS</i>
	GDPR MANAGEMENT SYSTEM FORM	

CANTINA DI RAUSCEDO s.c.a. wants to inform you that (EU) Regulation 2016/679 (“GDPR”) establishes the new rules for the protection of persons and other parties in regards to the Processing of Personal Data.

In accordance with the above mentioned regulation, such Processing will be inspired by lawfulness, decency and transparency and by the safeguarding of privacy and rights in conformity with the principles contained in art. 5 of the GDPR.

In accordance with art. 13 of the GDPR the following information is provided:

#### DATA CONTROLLER

The Data Controller is CANTINA DI RAUSCEDO s.c.a. with registered office in Via del Sile, 16 – Rauscedo – 33095 SAN GIORGIO DELLA RICHINVELDA (PN) and it may be contacted via email at [info@cantinarauscedo.com](mailto:info@cantinarauscedo.com) or phone at 0427.94020.

#### PROCESSED PERSONAL DATA

“Data” are those relating to natural persons and processed by the Company for the signature and implementation of contracts with clients/suppliers, as well as those belonging to the legal representative of the company undersigning the contract for and on behalf of the latter, and those of the employees/consultants of the client/supplier involved in the activities pertinent to the contract. Data regulating specific data categories may also be processed as per the legislation on health and safety in the workplace. Data may also include judicial data recorded in public databases.

#### PROCESSING PURPOSES

- Creating and executing the contractual relationship between the Company and its client/supplier;
- Fulfilling administrative and accounting duties;
- Complying with requirements of law, regulations, EU regulations or authority orders;
- Verifying, exercising and/or defending the Company rights in a Court of Law;
- Sending newsletters, business communications and/or advertising material on products or services offered by the Controller via email, mail and/or text message and/or telephone, and surveying on the service satisfaction rate.

#### DURATION OF DATA STORAGE

For the duration of the contract and for an additional 10 years after the contract termination, unless otherwise established by the current legislation. Storing time may be longer or different in accordance with industry regulations and for any necessity of defense in Court. In case of legal dispute the duration of data storage extends to the whole duration of the dispute and for the full length of enforceability of the appeal.

Data will be stored for marketing communication purposes for 2 years from the termination of the contract or until your declaration of dissent.

***Once storage terms are terminated the above mentioned data are destroyed, cancelled or made anonymous as per technical procedures of cancellation and backup.***

#### LEGAL BASES OF DATA PROCESSING

Data processing is necessary to the performance of a contract and to comply with the legal obligations of the data controller. It is always possible to request the Controller for a clarification of the actual legal basis for each process.

Any marketing communication such as soft spam bounce in a preexisting B2B relationship is part of the legitimate interest of the Controller and it is compliant with the guidelines of the Authority and the GDPR.

#### DATA SUPPLY

Data supply is mandatory since strictly essential to the performance of the above mentioned purposes and any failed supply makes it impossible to achieve the same purposes.

#### DATA RECIPIENTS

Data may be disclosed to external parties in their capacity as Data Processors or rather parties that are responsible for the Processing and have been named so by the Controller in conformity with art. 28 of the GDPR, including but not limited to public bodies and authorities and various service consultants and suppliers.

The complete list of Recipients and Data Processors named by the Controller is always available at the registered office of the Data Controller.

#### PARTIES WITH AUTHORIZATION TO DATA PROCESSING

Data may be processed by employees that have been appointed tasks with the above mentioned purposes, have been expressly authorized to data processing and have been adequately instructed.

#### TRANSFER OF PERSONAL DATA

In accordance with art. 44 and ff. of the GDPR 2016/679 some of your personal data may be disclosed to recipients and Processors named by the Controller in Third Countries outside of Europe in conformity with the principles of lawfulness, fairness, transparency and privacy protection.

#### DATA SUBJECT RIGHTS AND COMPLAINTS

Data subjects can exercise their rights on personal data established by art. 15 and ff. of the GDPR, and specifically:

The **Right of access** (art. 15) – consists in obtaining a confirmation by the Data Controller that their personal data are being processed and, if so, obtaining access to the same data and to some information (specified in the above mentioned article) on the data. The **Right to rectification** (art. 16) – consists in giving them the chance to change their data if inaccurate. The **Right to erasure** (art. 17) – gives them the chance to have the data held by the controller erased when, for example, consent to processing is withdrawn, the purpose is achieved or when unlawful. A request to erasure cannot always be fulfilled. For instance it cannot be fulfilled when data are necessary to a legal obligation or to defend a right in Court. The **Right to object** (art. 21) – gives them the chance to object to data processing and it is guaranteed when the legal basis is the legitimate interest or a task in the public interest. This right also

has its limitations since there may be cases when the legitimate interest of the controller prevails on the legitimate interest of the data subject. A correct balance of the two interests is fundamental in these cases. There are limitations to the right also in case it is necessary to fulfill a task in the public interest or to verify, defend or exercise a right in a Court of Law. The **Right to data portability** (art. 20) – which establishes that, in case of a data processing based on a contract or a consent, and if requested, personal data may be given to the data subject in a format that is structured and legible from an automated device (json, xml, csv). This right only applies to data that have been provided spontaneously and not to derived or inferred data. The **Right to withdrawal** (art. 7) – gives the right to withdraw their consent to any form of data processing requested by the Controller except for the mandatory fulfilments of the law in force at the time of the withdrawal request.

The data subject has the right to lodge a complaint to the supervisory Authority in the Member State of his or her habitual residence or work or in the State where the alleged violation took place.

All the aforementioned rights may be exercised by sending a request to the Data Controller via the contact channels indicated in this notice.

Date \_\_\_/\_\_\_/\_\_\_\_\_

The Data Controller

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