INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA – CUSTOMERS

Dear Customer,

Subject: Information on the processing, communication and movement of data, in application of the European Data Protection Regulation - -Reg. 679/2016 (GDPR)

PREMISE

Pursuant to articles 13 and 14 of EU Regulation 2016/679 (GDPR), laying down provisions for the protection of individuals with regard to the processing of personal data, the Data Controller is required to provide the subject with some information regarding the use of their personal data.

In particular, the undersigned **Italdiamant S.r.l.** during the contractual or pre-contractual relationship, acting in the role of Data Controller pursuant to the GDPR, in relation to the proper provision of services for the production and marketing of diamond tools, will need to process so-called personal data, as they refer directly or indirectly to individuals belonging to its organization, as well as business data of an economic/technical/administrative/organizational nature necessary to fulfill the legal obligations related to or relating to the organization of services.

The information and personal data provided by you, or acquired within the framework of the contractual relationship with the undersigned, are processed in compliance with the laws in force and the confidentiality obligations that have always inspired the activity of **Italdiamant S.r.l.**

Data controller is: **Italdiamant S.r.l.**

Via Montello, 34 - 36034 Malo (VI)
Tel. +39 0445 580750 - Fax +39 0445 580755
info@italdiamant.com

PURPOSE OF THE TREATMENT

The processing of data is aimed at the pre-contractual and contractual management of the activities carried out on behalf of the Customer by **Italdiamant S.r.l.**. In particular, we highlight the following purposes:

a. Commercial and pre-contractual management, in relation to all the activities that preceded the contractual stipulation;
b. Administrative and accounting management;
c. Management of the design, supply, delivery and assistance services of the solutions and products supplied as per contract and / or order;
d. Post-sale sales and promotional management, in relation to solutions, new products, organization of events, in line with the proposed services and solutions.

The processing will be carried out with the main support of electronic tools, and may cover data and information on computer or paper media, by authorized individuals.

In general, for the purposes mentioned above, as appropriate, the data will be stored at our company, at the customer's IT infrastructure, at our datacenters, or at our suppliers' datacentre and will be communicated exclusively to the competent subjects, internal or external to the organization, as described below, for the completion of the services necessary for a correct management of the contractual relationship and the underlying services with guarantee of protection of the rights of the interested party.

LEGALITY AND LEGAL BASIS OF TREATMENT

The processing of personal data by the controller is legitimized by the following conditions (art.6 of the GDPR):

- The interested party has given his/her consent to the processing of his/her personal data for one or more specific purposes
- The processing is necessary for the execution of a contract of which the interested party is a party and for the possible execution of pre-contractual or post-contractual measures taken at the request of the same.
- Processing is necessary to fulfil a legal obligation to which the Data Controller is subject (in particular for administrative and accounting purposes).

- The processing is justified by a legitimate interest of the owner, such as sending commercial and / or promotional communications relating to products and services similar to those covered by the contractual relationship.

SCOPE AND CATEGORIES OF SUBJECTS TO WHICH DATA MAY BE COMMUNICATED AND POSSIBLE LIABILITIES

Personal data collected by **Italdiamant S.r.l.** may be communicated, within the limits and in the forms strictly pertinent to the aforementioned purposes, also to the following subjects or categories of subjects:

i. Subjects to whom communication is required by law, by regulation or by national and community legislation as well as for the performance of contractual or pre-contractual obligations;
ii. Credit Institutions, Insurance Companies and other entities for the execution of contractual or pre-contractual obligations (payment of payments, stipulation of compulsory insurance policies, etc.);
iii. External studies and professionals specialized in consulting for the management of accounting and tax aspects for the fulfilment of the law (e.g. accountant, auditing company, etc.);
iv. Companies that carry out any activities of transport and shipment of the goods in relation to the customer's personal details.

DATA TRANSFER

As a rule, the Data Controller does not transfer personal data to third countries or to international organizations. For administrative reasons and related to the same (e.g. insurance policies) by the undersigned, some data referring to his / her person / organization could be transferred within the territory of a Member State of the European Union, of a state belonging to the European Economic Area or territory that the European Commission has identified as being able to guarantee an adequate level of protection of personal data under the GDPR, or even to countries outside the EU. In the latter case, the undersigned guarantees that the transfer of data takes place on the basis of an adequacy decision of the European Commission pursuant to art. 45 of the GDPR, or that the transfer of data will be subject to adequate guarantees pursuant to art. 46 of the GDPR, ensuring that those who receive the data are contractually bound at least to the same obligations of the Data Controller.

The undersigned also reserves the right to use services in cloud; in which case, the service providers will be selected among those who provide adequate guarantees, as required by art. 46 GDPR 679/16

DATA CONSENT AND CONSEQUENCES OF MANDATORY/NOT MANDATORY CONSENT FAILURE

The data consent must be considered mandatory with regard to the processing that the organization must carry out to fulfil its obligations towards the data subject on the basis of the existing relationship (or contract), as well as legal obligations, rules, regulations - see paragraph purposes, b) and c) - Failure to provide such data may make it impossible for **Italdiamant S.r.l.** to carry out the ongoing relationship.

The consent is not mandatory for all other purposes and, even if conferred, can be revoked at any time by the interested party. In the event of failure to provide consent, the consequences will be assessed from time to time, having regard to the specific case. For the purposes a) and d) the communications will always be accompanied by an information for the processing of data and will always be given the right to withdraw from communications of a commercial or promotional nature

DATA STORAGE PERIOD

The data are kept only for the period necessary for the purposes for which they are processed, or in accordance with the laws, national and community laws and regulations to which the organization must comply (e.g. accounting and tax regulations, etc.). It is expected that a periodic check will be carried out annually on the data processed and on the possibility of being able to cancel them if no longer necessary for the intended purposes.

The Controller undertakes to provide feedback within 30 days and, in case of impossibility to comply with these times, to justify the possible extension of the terms provided. The response will be free of charge, except in cases of groundlessness or excessive requests for which a fee may be charged that is not higher than the costs actually incurred for the research carried out.

In particular, we remind the rights of the subject to access, rectify or delete data, and those to limit or opposite to processing, as shown in the tables below:

Access (art.15)	- The data subject has the right to obtain from the controller a confirmation whether his/her data are being processed. - Access to personal data of the subject by the data controller. - Information about purposes, categories of processed data, the recipients (in particular recipients in third countries), period of storage and criteria used to determine that period; - the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; - Existence of automated decision-making, including profiling, logic involved and the envisaged consequences.
Rectification (art.16)	- Right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning the subject. - Integration of incomplete personal data.
Erasure (art.17)	In case: - Personal data are no longer necessary in relation to the purposes for which they were collected; - Data subject withdraws consent and there is no other legal ground for the processing; - Data subject objects to the processing and there are no overriding legitimate grounds for the processing; - The processing is unlawful; - Personal data have to be erased for compliance with a legal obligation ; - Personal data have been collected in relation to the offer of information society services referred to children
Restriction (art.18)	Temporary restriction of processing where one of the following applies: - The accuracy of the personal data is contested; - The processing is unlawful and the data subject opposes the erasure; - The controller no longer needs the personal data, but they are required by the data subject for legal claims - The data subject has objected to processing. The data Controller is required to retain the data and performs any other processing only under certain conditions.
Portability (art.20)	For treatments based on consent or on a contract, the data subject is entitled to receive from the Data Controller his personal data in electronic format "in common use" in order to transmit them to another Data Controller (also directly from the Data Controller to the Data Controller). Personal data "portable" are those that the data subject has provided directly and explicitly to the controller, but also those collected during the provision of the service, such as, for example, traffic or navigation data (for network service providers) .

Opposition (art.21)	Opposition to the processing of personal data based on the criteria of lawfulness of the exercise of public interest or of the legitimate interest of the Controller, including direct marketing or any profiling; The Data Controller shall no longer process the data, except legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims The data controller shall not longer process the personal data processing for direct marketing purposes.

Below other rights reserved to the subject.

Complaint (art.77)	Right to lodge a complaint with a supervisory authority (Guarantor of privacy), if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.
Remedy (art.82)	Right to obtain from the Controller the full and effective remedy for any damage suffered, material or immaterial (financial loss, identity theft, discrimination, etc.), if he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data in non-compliance with this Regulation and the Data Controller are not able to prove that the harmful event is not attributable to them.

For the processing legitimated by a consent, the subject has the right to revoke it at any time without prejudice to the lawfulness based on the consent given prior to the revocation.

Kindest regards.

THE DATA CONTROLLER