

POLICY

Art. 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016

Under Article 13 of the General Data Protection Regulation – Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “GDPR”), it is our responsibility to provide you with certain information about the processing of personal data supplied in connection with your relationship with RPS S.p.A..

Data Controller
The Data Controller is RPS S.p.A., headquartered at Legnago (Verona), Viale Europa no. 7, tax code and Verona Companies Register number: 02647040233 (the “Data Controller” or “Company”).
Data Protection Officer (“DPO”)
The DPO's contact data can be found on the Data Controller's website at www.riello-ups.it or from its head office. In order to exercise your rights and for any communications, problems and/or requests for clarification about the protection of your personal data, you are free to contact the DPO.

Purposes for which your consent is not required

Purpose	Legal basis for the processing
Management of the archiving/conservation of data, the sending of information and communications, including online communications and the sending of documents pertaining to your relations with the Company.	(Art. 6(1) c), GDPR) Processing necessary to fulfil a legal obligation of the Data Controller

Purposes for which your consent is required

Purpose	Legal basis for the processing
Perform market and / or customer satisfaction surveys.	Art. 6(1) a), GDPR) Consent

Your personal data may be disclosed to employees and/or collaborators of the Data Controller who have been duly appointed as authorised data processors and trained on the processing of such data, or data coordinators (if external to the Company), and disclosed to other persons or categories of person other than the Data Controller, such as:

Third parties or categories	Purpose	Notes
Information technology providers	Management, maintenance, updating of systems and software used by the Data Controller and video surveillance systems	Appointment as data processor (Art. 28 GDPR) Information from the DPO
Network providers, providers of online communications services, IT and online archiving services, computerised data storage and management	Hosting, housing, Cloud, SaaS and other remote information technology services that are essential to the business of the Data Controller; regulatory archiving and conservation of online documents	Appointment as data processor (Art. 28 GDPR) Cloud services may entail the processing of data in non-EU countries that can

		guarantee adequate privacy rights. Information from the DPO
Consultants, professionals, law firms, arbitrators, insurance companies, valuers, brokers	Judicial, extrajudicial and insurance activity in relation to claims Organisational, administrative, financial and accounting management	Appointment as data processor (Art. 28 GDPR) Information from the DPO

Period of conservation of the data.

Below we illustrate the retention period of personal data or, if this is not possible, the criteria used to determine this period.

Personal data and documents	Conservation period or criteria used to determine it
Personal and contact data	For the period necessary to pursue the purposes of the processing and, in any case, for a period not exceeding 24 months.

Rights as provided for in the GDPR pertaining to the processing of data, which you may request from the Data Controller.

Right	Description	Mode of exercising the right
Right to revoke consent (Art. 13(2) c)	You have the right to revoke consent to the processing operations for which consent is required, without affecting the legitimacy of the processing based on consent that was completed before the time of revocation.	Forms on website
Right of access to data (Art. 15)	You may request a) the purposes of the processing; b) the categories of personal data concerned; c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; e) 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; f) the right to lodge a complaint with a supervisory authority; g) where the personal data are not collected from the data subject, any available information as to their source; h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4), and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. You have the right to request a copy of the personal data that have been processed.	Forms on website

Right	Description	Mode of exercising the right
Right of rectification (Art. 16)	You have the right to obtain the rectification of inaccurate personal data concerning you, and to have incomplete personal data completed.	Forms on website
Right to be forgotten (Art. 17)	You have the right to obtain from the Data Controller the erasure of your personal data if that data is no longer necessary for the purpose for which it was collected or otherwise processed.	Forms on website
Right to restriction of processing (Art. 18)	You have the right to obtain from the Controller restriction of processing when you have contested the accuracy of the personal data (for a period enabling the Controller to verify the accuracy of the personal data) or if the processing is unlawful but you oppose the erasure of the personal data and request the restriction of their use instead; or if they are necessary for the establishment, exercise or defence of a right in legal proceedings, while they are no longer necessary to the Data Controller.	Forms on website
Right to data portability (Art. 20)	You have the right to receive, in a structured, commonly used and machine-readable format, personal data that relates to you, and you have the right to transmit that data to another data controller, if the processing: (i) is based on consent, (ii) on a contract, and (iii) if the processing is carried out with automated means, unless the processing is necessary to carry out a task in the public interest or is connected to the exercise of public powers and such transmission does not infringe the right of others.	The right may be exercised by starting the relevant procedure with the Data Controller
Right to object (Art. 21)	You have the right to object at any time to the processing of all or part of your personal data if the processing is carried out in the pursuit of a legitimate interest of the Data Controller or for the purposes of direct marketing.	Forms on website
Right to lodge a complaint with a Supervisory Authority (Art. 77)	You may lodge a complaint with a Supervisory Authority if you consider that the data processing infringes the GDPR.	

The exercise of the above rights is subject to the limitations, rules and procedures laid down in the GDPR, which the Data Subject must be familiar with, and implement. In accordance with the provisions of Article 12 (3) the Data Controller will provide the data subject with information on the actions taken without unjustified delay, no later than one month from receipt of the request. This period may be extended by two months if necessary, taking into account the complexity, and number of the requests. The Data Controller will inform the data subject of the extension, and of the reasons for the delay, within one month from receiving the request.

The personal data you provide may be processed by the Data Controller with or without the use of automated means.

Please also note that the communication of your personal data for the obligatory purposes is a legal or contractual obligation, or is a necessary requirement for the fulfilment of a contract. You are therefore obligated to provide your personal details because otherwise it will not be possible to manage the relationship with the Company.