

## G) INFORMATIVE STATEMENT ON PROCESSING THE PERSONAL DATA OF CLIENTS

### INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF EUROPEAN REGULATION 679/2016

Dear Sir/Madam,

Sintagma S.r.l. processes information concerning you, your personal data, in order to perform the services and provide you with the information requested by you; therefore, as required by the European regulation for the protection of personal data (European Regulation 679/2016 GDPR), we provide you with the following information.

#### **1. Controller**

The Controller, or the party responsible for the decisions regarding the purposes, modalities and security of personal data, is Sintagma S.r.l., with registered office in 06132 San Martino in Campo (PG), Via Roberta, 1, VAT number 01701070540, in the person of the legal representative *pro tempore*.

#### **2. Purposes and legal grounds for processing**

The personal data that you will provide us and that will be collected during the supplying of the services you have requested will be processed for the purposes and according to the legal grounds indicated below:

<b>PURPOSES</b> <i>(Why we process your data)</i>	<b>LEGAL GROUNDS</b> <i>(On the basis of which legal provision we process your data)</i>	<b>CONSEQUENCES OF REFUSAL OF PROCESSING</b> <i>(What happens if you refuse to provide your personal data and/or to authorize the processing of them)</i>
To effectively manage your relationship in all its contractual aspects.	Art. 6(1) point b, GDPR, the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.	Consent is not required; if you refuse to provide your personal data it will not be possible to carry out your requests.
To comply with legal accounting, tax and administrative obligations connected with the assignment.	Art. 6(1) point c, GDPR, the processing is necessary for compliance with a legal obligation to which the controller is subject.	Consent is not necessary; however, if you refuse to provide your personal data, as these obligations are required by law, it will not be possible to continue with the assignment.
Assert or defend a right in court (breach of contract, notices, transactions, debt collection, arbitration, legal disputes).	Art. 6(1) point f, GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.	Consent is not required, but if you refuse to provide the data, we will not be able to perform the contract.

### **3. Recipients and categories of data processed**

The personal data provided by you or acquired during the course of the service will be processed exclusively by personnel authorized for this purpose or by processors designated for this purpose.

Your data will be disclosed to the following recipients:

<b>PURPOSES</b>	<b>CATEGORIES OF DATA</b>	<b>RECIPIENTS</b>
To fulfill legal obligations	Identification, economic data	Revenue Authority, Public Authorities
Accounting, administrative and tax obligations. Legal and statutory obligations.	Identification of representatives or contract contact persons.	Professionals and/or companies that do accounting/tax data processing.
Collection of payments	Identification, contract data	Credit institutes
To carry out the assignment, in your interest	Identification, economic data, contract data	Professional specialists for specific matters regarding opinions and/or consultancy
Protection in the event of breach of contract	Identification, economic data, data related to the contract	Firms and professionals handling possible cases
To ensure the functioning of the company IT system	Identification data and data relating to the contract in the company IT system	Companies in charge of the management, assistance and maintenance of the IT network and of company electronic, IT and/or telematic equipment

### **4. Transfer to third countries**

Your personal data will not be transferred outside the European Union.

### **5. Period for which the personal data will be stored and criteria used**

The personal data being processed are collected in documents the storage of which is established consistently with the purposes of the processing as summarized below.

<b>DOCUMENT</b>	<b>DURATION OF THE STORAGE</b>
Contracts	10 years from the end of the relationship
Accounting and tax documents	10 years from the date of issue

### **6. Rights of the data subject**

The Regulation recognizes the following rights that you may exercise in respect of and against each joint controller.

A complete extract of the following articles of law is available on the Internet at:

<http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/6264597>.

- Right of access: Art. 15 of the European Regulation allows you to obtain from the controller confirmation as to whether or not personal data concerning you are being processed
- Right to rectification: Art. 16 of the European Regulation allows you to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- Right to erasure: Art. 17 of the European Regulation allows you to obtain from the controller the erasure of personal data concerning you without undue delay if there is one of the grounds provided for by the Regulation.
- Right to restriction: Art. 18 of the European Regulation allows you to obtain from the controller restriction of processing where one of the cases provided for by the Regulation applies.

- Right to object: Art. 21 of the European Regulation allows you to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions.
- Right to data portability: Art. 20 of the European Regulation allows you to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format, and you have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, according to the conditions foreseen by the Regulation.
- Right to withdraw consent: Art. 7 of the European Regulation allows you to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- Right to lodge a complaint: Art. 77 of the European Regulation gives you the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data relating to you infringes this Regulation.

## **7. Further information**

More information, our privacy policy, and this information are available on our website at [www.sintagma-energia.it](http://www.sintagma-energia.it).

A complete extract of the aforementioned articles of law is available at the company's Privacy Office at Via Roberta, 1, 06132 San Martino in Campo (PG).

This office will be able to provide you with all the explanations you may need regarding the exercising of your rights. Requests can be sent in writing, accompanied by a valid identification document, at the controller's office as indicated above.

## **8. Cooperation**

The protection of data concerning you and compliance with the principles established by the regulation, especially with regard to the principle of transparency, are values of primary importance for us. We will be grateful if you could help us by informing us of any misunderstandings of this document or suggesting improvements to us at the controller's contacts as indicated above.

*Perugia, June 8, 2021*