



## **Policy pursuant to Article 13 of EU Regulation 2016/679**

(personal data collected from the interested party)

Dear customer, supplier, contact, ...

we wish to inform you, pursuant to Articles 12, 13, and 14 of the 2016/679 European Regulation, also known as the "General Data Protection Regulation" (hereinafter "GDPR"), relating to the protection of natural persons with regard to the processing of personal data, as well as to the free movement of such data, that the information and data supplied by you or otherwise acquired in the context of the services and products provided by the **Sim-Patia Social Cooperative** will be processed in compliance with the aforementioned provisions and with the confidentiality obligations that inspire the activities of our organization.

By processing of personal data, we mean any operation or set of operations, carried out even without the aid of electronic instruments, concerning the collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, cancellation, and destruction of data, even if not recorded in a database.

The purpose of this information is to make transparently known the purposes for which we could use your data, how we will manage them, to whom they could be communicated, where they could be transferred (inside or outside the EU), and what your rights are.

### **WHO PROCESSES YOUR DATA**

Your data will be processed by the **Sim-Patia Social Cooperative** as Data Controller.

In addition to the Sim-Patia Social Cooperative, we hereby inform you that there are External Managers for the processing of personal data who have been appropriately mapped, surveyed, contracted, and appointed by the Sim-Patia Social Cooperative on the basis of the provisions of Art. 28 of the GDPR. The list of external managers for the processing of personal data is available at the headquarters of the **Sim-Patia Social Cooperative**.

### **WHY WE NEED YOUR DATA**

**Sim-Patia Social Cooperative** will use your data exclusively for the following purposes:

- execution of obligations deriving from a contract to which you are a party to fulfill, before and after the

execution of the contract, your specific requests;

- fulfillment of legal obligations of an administrative, accounting, civil, and fiscal nature, regulations, and EU and non-EU legislation;
- management of suppliers (administration of suppliers, administration of contracts, orders, arrivals, invoices, selections in relation to company needs);
- management of litigation (breach of contract; notices, transactions, debt collection, arbitration, legal disputes).

**Sim-Patia Social Cooperative** will process the data:

- because it is necessary for the above contractual obligations;
- because the processing is necessary to pursue a legitimate interest (e.g. the creation and marketing of its products).

It follows that the provision of personal data is **mandatory for the purposes indicated above**.

Failure to provide data will make it impossible to achieve the purposes previously indicated and, therefore, to follow up on the contractual relationship.

The extent and adequacy of the data provided will be assessed from time to time in order to determine the consequent decisions and avoid the processing of data beyond the purposes pursued.

**Sim-Patia Social Cooperative** undertakes not to use your personal data for different and additional purposes than those described in this information, except by informing you in advance and, where necessary, obtaining your consent.

## **HOW WE WILL USE YOUR DATA**

**Sim-Patia Social Cooperative** aims to protect its customers' data, basing their treatment on principles of



correctness, lawfulness, and transparency. We therefore inform you that your Personal Data will be processed through the use of tools and procedures suitable for guaranteeing maximum security and confidentiality, through archives and paper supports, with the aid of digital supports, IT, and telematic means.

We would like to remind you that you have the right to exercise the right to object, which, in the absence of your indication to the contrary, will refer to both traditional and automated communications.

### **HOW LONG WE WILL KEEP YOUR DATA**

Your Personal Data will be kept, starting from their receipt or update, for a period congruous with respect to the processing purposes indicated above and in compliance with the provisions of the law in the first place. With a view to full transparency, the document "Data Retention Policy", an integral part of the company's Data Protection Management System, is available at the **Sim-Patia Social Cooperative** headquarters, and you have the right to request a copy by contacting the company at the following email address: <https://sim-patia.org/>.

In the same document, you will also find indications about the criteria used to determine this period.

### **WILL WE SHARE YOUR DATA WITH OTHER PARTIES?**

The personal data processed will not be disseminated but may be communicated to well-defined subjects.

On the basis of the roles and job duties performed, internal and external personnel are entitled to processing within the limits of their competences and in accordance with the instructions given to them by the Data Controller.

The same data may be communicated to subjects entitled to access it by virtue of the provisions of the law, regulations, and standards, to mail delivery companies, banks and credit institutions, law firms, insurance companies, IT equipment maintenance companies, protection firms or providing companies, accounting, and tax services. taxpayers, self-employed or occasional workers, and agents.

For all the purposes indicated in this statement, your data may also be communicated abroad, inside and outside the European Union, in compliance with the rights and guarantees established by current legislation, after verifying that the country in question guarantees an "adequate" level of protection.

The Data will also be processed by internal resources of the Sim-Patia Social Cooperative, adequately trained, who operate as personnel authorized to process the Data.

Access to archived data may only be granted by public authorities in the cases and methods provided for by current laws in the event of legal disputes.

Your Personal Data will not be disclosed.

### **WHAT ARE YOUR RIGHTS?**

With reference to Article 7 of Legislative Decree 196/2003 and to Articles 15 "right to access", Art. 16 "right of rectification", Art. 17 "right to cancellation", Art. 18 "right to limitation of treatment", Art. 20 "right to portability", Art.21 "right to object", the interested party exercises his rights by writing to the Data Controller at the following address: **Sim-Patia Social Cooperative**, registered office Via Parini, 180 – 22070 Valmorea (CO) - Tel.: +39 (0)31 / 806030 Fax: +39 (0)31 / 806078 - Email: [info@sim-patia.it](mailto:info@sim-patia.it) - PEC: [info@pec.sim-patia.it](mailto:info@pec.sim-patia.it).

At any time, you will therefore have the right to ask:

- access to your personal data;
- their rectification in case of inaccuracy of the same;
- cancellation;
- the limitation of their treatment.

You will also have:

- the right to object to their treatment even if processed for the pursuit of a legitimate interest of the **Sim-Patia Social Cooperative**;
- the right to their portability, i.e., to receive the personal data you provide in a structured, commonly used, and

machine-readable format.

We will take charge of your request with the utmost commitment to guarantee the effective exercise of your rights.

Finally, you will have the right to lodge a complaint with the national supervisory authority (Privacy Guarantor).

For complete knowledge of all the rights of the interested party, refer to Chapter III of the GDPR.

### **CAN YOU REVOKE YOUR CONSENT ONCE GIVEN?**

Yes, you can revoke your consent at any time, however, without being able to:

- prejudice the lawfulness of the treatment based on the consent given before the revocation;
- prejudice further processing of the same data based on other legal bases (for example, contractual obligations or legal obligations to which the Sim-Patia Social Cooperative is subject).

The identification details of the Data Controller for the processing of data supplied by you are as follows:

**Sim-Patia Social Cooperative**, Sim-Patia Social Cooperative, registered office in Via Parini, 180 – 22070 Valmorea (CO)- Tel.: +39 (0)31 / 806030 Fax: +39 (0)31 / 806078 - Email: [info@sim-patia.it](mailto:info@sim-patia.it) - PEC: [info@pec.sim-patia.it](mailto:info@pec.sim-patia.it), which you can contact at any time to exercise the rights provided for by the GDPR and listed in detail above.

The Data Controller

**Sim-Patia Social Cooperative**