

PRIVACY NOTICE

EU REGULATION 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data

NAVAL SUPPLIERS SRL processes personal data in compliance with the provisions of EU REGULATION 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

According to articles 13 and 14 of the above regulation, the information relative to the identification data of the controller and of the processor with regard to the processing of personal data relative to the contracts with the **CUSTOMERS/SUPPLIERS** are set out herebelow (hereinafter also **Data Subject**).

The Controller is the company NAVAL SUPPLIERS SRL, with offices at Zona industriale n° 24, 33049 San Pietro al Natisone (UD), tel. 0432 727860.

Type of processed data

Data supplied and processed by NAVAL SUPPLIERS SRL relate to identifying personal data of common type, administrative data, accounting data, banking data, financial data, tax data.

Purposes of the processing

We hereby inform you that the personal data, provided directly from the data subject and/or acquired through the filling of forms available in the internet sites managed by NAVAL SUPPLIERS SRL, are processed for:

- 1.** purposes related to the conclusion and fulfillment of the commercial contracts agreed upon, for the relevant accounting and fiscal obligations relative to invoicing or in compliance to legal requirements provided for by law, regulation, EU legislation or Authorities orders (such as in anti-money laundering matters), or in order to exercise rights of the Controller (such as the right to defense in judicial proceedings).
- 2.** purposes related to the dispatch of commercial proposals and communications

The provision of data to the purposes stated in paragraph 1 is compulsory; therefore any refusal to give such data or to the relevant processing may cause the impossibility for the Controller to initiate and proceed the relevant precontractual relationships.

The provision of data to the purposes stated in paragraph 2. is optional. You may decide not to provide any data or to refuse afterwards the possibility to process already provided personal data: in such case you will not receive newsletter, commercial communication and promotional material relative to the Services offered by the Controller. You will still have the right to exercise the services whereby at preceding paragraph 1.

Modalities of the processing and access to data

Personal data collected through undersigning of standard contracts in paper forms are processed both by means of manual instruments and automated decision process and can be combined in aggregate form for statistical purposes and to verify quality standards of assistance and maintenance services, with exclusion of identifying data in the latter case.

Personal data collected through online forms are processed by means of automated decision process and IT management systems.

Personal data are available only to employees, adequately formed and informed about their tasks and the allowed activities on the collected personal data, who act on behalf of NAVAL SUPPLIERS SRL and whom are recipient of instructions and tasks given by the processor by means of appointment letter.

The controller will process personal data for the above purposes pursuing its legitimate interests when same are not overridden by the interests or rights and freedoms of the data subject.

Scope of disclosure by transmission and possible dissemination

Personal data of customers and clients can be transmitted to public administrations or companies exercising a public service within the presentation of application forms for the participation in procedures for the selection of contractors, to the extent of tendering or contract awards relative to the supply of goods and services, according to the applicable legislation in public contracts for purposes relating to technical qualification.

Personal data relative to the contract and to the service activities can be communicated to accounting experts for administrative and accounting purposes and to lawyers in order to handle possible litigation.

Personal data may be transmitted to a European Union country or a third country or an international organization within the purposes stated in article 1., when necessary for the performance of the agreed contract and/or for the conclusion or performance of a contract concluded in the interest of the data subject by the Controller with a third party, even in the absence of an adequacy decision by the Commission given the deficiency of appropriate or suitable safeguards on data protection in such third country. In such case the transfer of personal data to extra EU countries will occur in compliance with applicable legislation.

Personal data can also be disclosed or be accessible to controlled or affiliated undertakings of NAVAL SUPPLIERS SRL, or to other parties that maintain the IT system, or to other persons that take care of specific phases of the processing, in their capacity of processors of NAVAL SUPPLIERS SRL, whose names are verifiable upon request of the data subjects.

Personal data can also be disclosed to police or judicial authorities for purposes of detection or prosecution of criminal offenses committed by the users of informatics services, when necessary.

Personal data will not be disclosed by dissemination.

Personal data can be processed for the purpose of ascertaining specific characteristics of certain types of recipients in order to convey communication and promotional activities suited for the interests of same recipients.

Storage of personal data

NAVAL SUPPLIERS SRL will keep personal data of data subjects in a form which permits identification of data subjects for no longer than is necessary for the purposes stated in above article 1; personal data will therefore be stored until the contractual relationship exists.

Personal data strictly necessary to fiscal and accounting purposes, once the other purposes whereof same were collected are exceeded, will be stored for 10 years or the different period provided for by applicable legislation.

Personal data collected for the purposes stated in preceding paragraph 2) will be processed and stored for no longer than 2 years from date of collection.

The data subject has the right to withdraw his or her consent given with reference to the above mentioned purposes at any time, without prejudice to the impossibility to prosecute the commercial relationship in such case and without affecting the processing of data previously acquired to the extent of fiscal and auditing requirements deriving from the performed contracts.

Rights of the data subject

The data subject can exercise the rights provided for by articles 15 to 22 of the EU regulation 679/16 :

Art. 15 – Right of access by the data subject - 1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
 - b) the categories of personal data concerned;
 - c) the recipients or categories of recipient 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.
2. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.
3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.
4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

Art. 16 – Right to rectification - The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Art. 17 – Right to erasure - The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies: a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing; c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2); d) the personal data have been unlawfully processed; e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject; f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1). 2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data. 3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary: a) for exercising the right of freedom of expression and information; b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3); d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or e) for the establishment, exercise or defence of legal claims.

Art. 18 – Right to restriction of processing - 1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies: a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject. 2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. 3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

Art. 19 – Notification obligation regarding rectification or erasure of personal data or restriction of processing - The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

Art. 20 – Right to data portability - 1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where: a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and b) the processing is carried out by automated means. 2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. 3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. 4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

Art. 21 – Right to object - The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling 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. 2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. 3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes. 4.

At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information. 5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications. 6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Art 22 – Automated individual decision-making, including profiling - The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. 2. Paragraph 1 shall not apply if the decision: a) is necessary for entering into, or performance of, a contract between the data subject and a data controller; b) is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or c) is based on the data subject's explicit consent. 3. In the cases referred to in points (a) and (c) of paragraph 2, the data controller shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision. 4. Decisions referred to in paragraph 2 shall not be based on special categories of personal data referred to in Article 9(1), unless point (a) or (g) of Article 9(2) applies and suitable measures to safeguard the data subject's rights and freedoms and legitimate interests are in place.

In such a manner data subjects have the right to access their data in order to:

- verify the accuracy of personal data
- rectify inaccurate personal data
- amend personal data by means of a supplementary statement
- request the erasure of personal data
- restrict the processing of personal data
- object to the processing

The controller shall reply without undue delay.

Erasure of personal data

NAVAL SUPPLIERS SRL in compliance with the right of access of the Data Subject, has prepared certain procedures whereby data subjects can request the erasure without undue delay of personal data or the restriction of the processing of data concerning him or her for the following reasons:

- if the controller no longer needs the personal data for the purposes of the processing;
- if the data subject has withdrawn consent;
- if the data subject objects to the processing
- if personal data have been unlawfully processed.

In order to exercise the rights mentioned in above articles 15 to 22 EU Reg. 679/16 the data subject can send a specific written request addressed to NAVAL SUPPLIERS SRL or send an email to the email address firedoors@navalsuppliers.com.

San Pietro al Natisone, _25.05.2018

Signature of Controller
NAVAL SUPPLIERS SRL

EXPRESSION AND ACQUISITION OF CONSENT

The Data Subject with reference to:

- the processing and disclosure, for the purposes stated in paragraph 1. and according to the modalities specified in this privacy notice, of his or her personal data:

GIVES CONSENT REFUSES CONSENT

- purposes related to the dispatch of commercial proposals and communications as stated in above paragraph 2.

GIVES CONSENT REFUSES CONSENT

- to the disclosure of his or her data - to the purposes and according to modalities specified in this privacy notice – outside the European Union in the absence of an adequacy decision by the Commission given the deficiency of appropriate or suitable safeguards on data protection:

GIVES CONSENT REFUSES CONSENT

Date, Stamp and Signature of acknowledgement and consent