



INFORMATION
ex artt. 13-14 Reg. 679/2016 UE
Customers and suppliers
PFB S.r.l.

Dear Customers and Suppliers,

P.F.B. Srl is aware of the provisions of EU Reg. 679/2016 and Legislative Decree 196/2003 for the protection of individuals with respect to the processing of personal data. According to this legislation, this treatment will be based on the principles of correctness, lawfulness and transparency, protecting your privacy and your rights.

Pursuant to art. 13 EU Reg. 679/2016, P.F.B. Srl therefore provides the following information:

Summary

a) IDENTITY AND CONTACT DATA OF THE DATA CONTROLLER	Errore. Il segnalibro non è definito.
b) RESPONSIBLE FOR DATA PROTECTION	1
c) PURPOSE AND LEGAL BASIS OF THE PROCESSING	1
d) NATURE OF DATA PROVISION	1
e) SCOPE OF DATA COMMUNICATION AND DATA PROCESSORS	1
f) STORAGE PERIOD	2
g) DATA SECURITY	2
h) RIGHTS OF THE INTERESTED PARTIES	2
RIGHTS OF THE INTERESTED PARTY	Errore. Il segnalibro non è definito.

a) IDENTITY AND CONTACT DATA OF THE DATA CONTROLLER:

PFB S.R.L.

Via Raimondo dalla Costa n. 690, Modena (MO)
VAT number 00158620369, number REA MO-118019
Email: privacy@pfb.it

b) RESPONSIBLE FOR DATA PROTECTION

The data controller has not designated the Data Protection Officer (DPO or RPD) pursuant to art. 37 EU Reg. 679/16 in that, due to its quality and the activities carried out, it does not carry out any treatments from which the need to name this figure derives.

c) PURPOSE AND LEGAL BASIS OF THE PROCESSING

The treatment that the Data Controller may carry out, will be carried out by means of an IT process and / or collection of paper documents and pursues the following purposes:

- c. 1) Pursuant to art. 6 par. 1 letter b) EU Reg. 679/16: execution of the obligations indicated in the established contractual relationship as well as, for customers, in accordance with the general conditions of sale published on the website www.pfb.it in the "Legal notes" section
- c. 2) Pursuant to art. 6 par. 1 letter c) EU Reg. 679/16: management of administrative, accounting, tax, tax obligations, as required by law, management of any disputes of the administrative, accounting and tax profiles related to the provision of the service.

The personal data provided will never be processed in order to carry out an automated decision-making process (so-called profiling).

In the event that the personal data provided must be processed for purposes other than those indicated above (for example, for marketing purposes if you wish to subscribe to our newsletter), the Data Controller will provide you with information regarding this different purpose and any further relevant information, requesting, where applicable, your express consent to the processing.

d) NATURE OF DATA PROVISION

The provision of data is mandatory for the execution of the purposes referred to in letter c) and their failure to provide it could make it impossible to execute the contractual relationship.

We inform you that, in compliance with the combined provisions of articles 4 point 11 and art. 6, paragraph 1, lett. b) EU Reg. 679/2016, the processing of the personal data provided is necessary (and therefore lawful) for the execution of the contractual relationship between the Parties and that the making available of this information, together with the completion of the contract, configures in each case your consent or in any case the absence of a will to oppose the treatment, through a positive and unequivocal action to the data processing.

e) SCOPE OF DATA COMMUNICATION AND DATA PROCESSORS:

Your personal data will be processed by subjects specifically appointed by the data controller as data processors appointed pursuant to art. 28 Reg. 679/16 EU and / or by anyone acting under his authority and who has access to personal data, duly instructed in accordance with the provisions of art. 29 EU Reg. 679/16; these subjects will process your data only if necessary in relation to the purposes of the conferment and only in the context of carrying out the tasks assigned to them by the data controller, undertaking to process only the data necessary for the performance of these tasks and to carry out the operations only necessary to carry them out. In particular, the following are the categories of third parties to whom the data may be disclosed according to the service provided by the data controller:

- Companies or external professionals who carry out specific tasks on behalf of the owner of the data processing (by way of non-exhaustive example, companies that provide assistance in relation to company management as well as management / maintenance / implementation of company IT systems; consultants in the administrative area , accounting, tax, legal, regulatory, etc ...): access to data by these subjects will take place only when necessary;
- Law firms and lawyers, for the possible protection of contractual rights;
- Credit institutes, and if necessary, to financial, leasing, recovery, protection and assignment companies, for the management of economic transactions;
- Central and peripheral government bodies, public bodies and other institutions for legal obligations.

The data communications previously described are, depending on the case, connected to specific legal / contractual obligations or are necessary for the conclusion of the contractual relationship or are strictly connected to normal business operations in the context of the management of the contractual relationship established and, are strictly necessary for the purposes referred to in paragraph c); therefore, failure to communicate may make it impossible to establish and / or correctly execute the contractual relationship.

e1) The Data Controller does not transfer the personal data of customers and suppliers for the purposes referred to in this statement to a non-EU country or an international organization; in case of changes, the same undertakes to carry out the treatment only in the presence of appropriate guarantees, providing to update this information;

e2) Personal data will not be disclosed.

e4) Pursuant to art. 28 of the REG. EU 679/2016, the Data Controller may use third parties who process data on his behalf and formally appointed by them as data controllers. The complete and updated list of the data processors designated will be provided to you by the Data Controller at your simple request, by sending a communication to the addresses indicated in point a).

f) STORAGE PERIOD

The data will be kept for the time necessary to achieve the purposes indicated above in point c). In particular:

- for the purpose referred to in par. c. 1): the data will be kept for the entire period of validity of the contractual relationship and until the complete execution of the services deduced in the same and for the subsequent time in the event of reporting defects and complaints;
- for the purpose referred to in par. c. 2): the data will be stored in accordance with current legislation and for 10 (ten) years from the conclusion of the relationship, except for different terms that may be required by law. In the event of a dispute, the retention period will start from the definitive conclusion of the dispute itself.

g) DATA SECURITY

The Data Controller, taking into account the state of the art and the implementation costs as well as the nature, scope, context and purposes of the treatment both when determining the means of treatment and at the time of the treatment itself (so-called risk analysis - accountability), has implemented adequate technical and organizational measures, aimed at effectively implementing the data protection principles and integrating the necessary guarantees in the processing in order to meet the requirements of EU Reg. 679/2016 and protect the rights of the interested party.

The data will be processed using methods and tools suitable to guarantee its security (art. 24, 25 and 32 EU Reg. 679/2016) and will be carried out through an automated process and through non-automated means (paper archives), to which all will be applied the technical and organizational measures aimed at guaranteeing a level of security appropriate to the risk, so as to ensure on a permanent basis, their confidentiality, integrity, availability and resilience of the treatment systems and services (by way of example but not limited to: checks on both assignment of the tasks to the persons in charge of data processing and on the classification of the data themselves; procedures, if sustainable, of pseudonymisation and encryption, disaster recovery mechanisms, etc.). Any profiling process is excluded.

h) RIGHTS OF THE INTERESTED PARTIES

The Data Controller also informs you that:

- h1) the interested party has the right to request the Data Controller to access their personal data and to correct or cancel them or limit their processing or to oppose their processing in addition to the right to data portability (art 15, art.16, art.17, art.18, art.20 REG. UE 679/2016); with the exercise of the right of access, the interested party has the right to obtain confirmation from the owner that personal data concerning him or her is being processed, while the exercise of the right to portability allows the interested party to obtain from the data controller the personal data in a structured, commonly used and legible format or the transfer of said data from the original data controller to another (see WP 242 of 13.12.2016);
- h2) the interested party has the right, in the event that the processing is based on article 6, paragraph 1, letter a) or on article 9, paragraph 2, letter a), to withdraw the consent at any time without prejudice the lawfulness of the treatment based on the consent given before the revocation;
- h3) the interested party has the right to lodge a complaint with a supervisory authority;
- h4) the interested party has the right to become aware, by the Data Controller, who must do so without justified delay, of a violation of personal data that could present a high risk for the rights and freedoms of natural persons (art. 34 EU REG. 679/2016).

The full text of the articles of the REG. EU 679/2016 relating to your rights (articles 15 to 22 inclusive) is available at the bottom of this information, as well as at the following link on the website of the Guarantor Authority for the Protection of Personal Data: <https://www.garanteprivacy.it/regulation> or, alternatively, it will be provided by the Data Controller at your simple request sent to the addresses indicated in point a).

RIGHTS OF THE INTERESTED PARTY
REG. UE 679/2016 (extract)

Article 15

Right of access of the interested party (C63, C64)

1. The interested party has the right to obtain from the data controller confirmation that personal data concerning him or her is being processed and in this case, to obtain access to personal data and the following information:
- the purposes of the processing;
 - the categories of personal data in question;
 - the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if recipients from third countries or international organizations;
 - whenever possible, the retention period of personal data provided or, if not possible, the criteria used to determine this period; ;
 - the existence of the right of the interested party to ask the data controller to correct or delete personal data or limit the processing of personal data concerning him or to oppose their treatment;
 - the right to lodge a complaint with a supervisory authority;
 - if the data are not collected from the data subject, all information available on their origin;
 - the existence of an automated decision-making process, including the profiling referred to in Article 22, paragraphs 1 and 4, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such treatment for the interested party. ;
2. If personal data are transferred to a third country or to an international organization, the interested party has the right to be informed of the existence of adequate guarantees pursuant to article 46 relating to the transfer.
3. The data controller provides a copy of the personal data being processed. In the event of further copies requested by the interested party, the data controller can charge a reasonable fee contribution based on administrative costs. If the interested party submits the request by electronic means, and unless otherwise indicated by the interested party, the information is provided in a commonly used electronic format.
4. The right to obtain a copy referred to in paragraph 3 must not infringe the rights and freedoms of others.

Article 16

Right to rectification (C65)

The interested party has the right to obtain from the data controller the correction of inaccurate personal data concerning him without undue delay. Taking into account the purposes of the processing, the interested party has the right to obtain the integration of incomplete personal data, also by providing an additional declaration.

Article 17

Right to erasure (<<right to be forgotten>>) (C65, C66)

1. The interested party has the right to obtain from the data controller the cancellation of personal data concerning him without undue delay and the data controller has the obligation to delete personal data without undue delay, if one of the following reasons exists:
- personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;
 - the interested party revokes the consent on which the treatment is based in accordance with article 6, paragraph 1, letter a), or with article 9, paragraph 2, letter a), and if there is no other legal basis for the treatment ;
 - the interested party opposes the treatment pursuant to Article 21, paragraph 1, and there is no prevailing legitimate reason to proceed with the treatment, or opposes the treatment pursuant to Article 21, paragraph 2;
 - personal data have been unlawfully processed;
 - personal data must be erased to fulfill a legal obligation under Union or Member State law to which the data controller is subject;
 - personal data have been collected in relation to the offer of information society services referred to in Article 8, paragraph 1.
2. If the data controller has made personal data public and is obliged, pursuant to paragraph 1, to delete it, taking into account the available technology and implementation costs, he shall take reasonable measures, including technical measures, to inform the data controllers who are processing the personal data of the request of the interested party to delete any link, copy or reproduction of his personal data.
3. Paragraphs 1 and 2 do not apply to the extent that processing is necessary:
- for the exercise of the right to freedom of expression and information;
 - for the fulfillment of a legal obligation that requires the treatment provided for by Union or Member State law to which the data controller is subject or for the execution of a task carried out in the public interest or in the exercise of public powers with which the data controller is invested;
 - for reasons of public interest in the public health sector in accordance with article 9, paragraph 2, letters h) and i) and article 9, paragraph 3;
 - for archiving purposes in the public interest, for scientific or historical research or for statistical purposes in accordance with Article 89 (1), insofar as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of such treatment; or
 - for the assessment, exercise or defense of a right in court.

Article 18

Right to limitation of treatment (C67)

1. The interested party has the right to obtain the limitation of the processing from the data controller when one of the following hypotheses occurs:
- the interested party disputes the accuracy of personal data, for the period necessary for the data controller to verify the accuracy of such personal data;
 - the processing is illegal and the interested party opposes the cancellation of personal data and instead requests that their use be limited;
 - although the data controller no longer needs it for processing purposes, personal data are necessary for the interested party to ascertain, exercise or defend a right in court;
 - the interested party has opposed the processing pursuant to Article 21, paragraph 1, pending verification of the possible prevalence of the legitimate reasons of the data controller with respect to those of the interested party.
2. If the processing is limited pursuant to paragraph 1, these personal data are processed, except for storage, only with the consent of the interested party or for the assessment, exercise or defense of a right in court. or to protect the rights of another natural or legal person or for reasons of significant public interest of the Union or of a Member State.
3. The interested party who obtained the limitation of treatment pursuant to paragraph 1 is informed by the data controller before said limitation is lifted.

Article 19

Obligation to notify in case of rectification or cancellation of personal data or limitation of treatment (C31)

The data controller informs each of the recipients to whom the personal data have been transmitted of any corrections or cancellations or limitations of the processing carried out pursuant to Article 16, Article 17, paragraph 1 and Article 18, unless this is you prove impossible or involve a disproportionate effort. The data controller communicates these recipients to the interested party if the interested party requests it.

Article 20

Right to data portability (C68)

1. The interested party has the right to receive in a structured format, commonly used and readable by automatic device, the personal data concerning him provided to a data controller and has the right to transmit these data to another data controller without impediments from part of the data controller to whom you provided them if:
 - a) the processing is based on consent pursuant to article 6, paragraph 1, letter a) or article 9, paragraph 2, letter a) or on a contract pursuant to article 6, paragraph 1, letter b) ; is
 - b) the treatment is carried out by automated means.
2. In exercising their rights regarding data portability pursuant to paragraph 1, the interested party has the right to obtain the direct transmission of personal data from one controller to the other, if technically feasible.
3. The exercise of the right referred to in paragraph 1 of this article is without prejudice to article 17. This right does not apply to the processing necessary for the performance of a task in the public interest or connected with the exercise of public powers the data controller is invested.
4. The right referred to in paragraph 1 must not infringe the rights and freedoms of others.

Article 21

Right to object (C69, C70)

1. The interested party has the right to object at any time, for reasons related to his particular situation, to the processing of personal data concerning him pursuant to Article 6, paragraph 1, letters e) of), including profiling on the basis of these provisions. The data controller refrains from further processing personal data unless he demonstrates the existence of binding legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the interested party or for the assessment, exercise or the defense of a right in court.
2. If personal data are processed for direct marketing purposes, the interested party has the right to object at any time to the processing of personal data concerning him / her carried out for these purposes, including profiling to the extent that it is connected to such marketing direct.
3. If the interested party objects to the processing for direct marketing purposes, personal data are no longer processed for these purposes.
4. The right referred to in paragraphs 1 and 2 is explicitly brought to the attention of the interested party and is presented clearly and separately from any other information at the latest at the time of the first communication with the interested party.
5. In the context of the use of information society services and without prejudice to Directive 2002/58 / EC, the interested party can exercise his right of opposition with automated means that use technical specifications.
6. If personal data are processed for scientific or historical research purposes or for statistical purposes pursuant to article 89, paragraph 1, the interested party, for reasons connected to his particular situation, has the right to object to the processing of personal data concerning him, except if the processing is necessary for the execution of a task in the public interest.

Article 22

Automated decision-making process relating to natural persons, including profiling (C71, C72)

1. The interested party has the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or which similarly significantly affects his person.
2. Paragraph 1 does not apply if the decision:
 - a) it is necessary for the conclusion or execution of a contract between the interested party and a data controller;
 - b) is authorized by Union or Member State law to which the data controller is subject, which also specifies adequate measures to protect the data subject's rights, freedoms and legitimate interests;
 - c) is based on the explicit consent of the interested party.
3. In the cases referred to in paragraph 2, letters a) and c), the data controller shall implement appropriate measures to protect the data subject's rights, freedoms and legitimate interests, at least the right to obtain human intervention by the data controller of the treatment, to express their opinion and to contest the decision.
4. The decisions referred to in paragraph 2 shall not be based on the particular categories of personal data referred to in Article 9 (1), unless Article 9 (2) (a) or (g) and adequate measures are not in force to protect the data subject's rights, freedoms and legitimate interests.

Article 34

Communication of a violation of personal data to the interested party (C68-C88)

1. When the violation of personal data is likely to present a high risk for the rights and freedoms of natural persons, the data controller communicates the violation to the interested party without undue delay.
2. The communication to the interested party referred to in paragraph 1 of this article describes in simple and clear language the nature of the violation of personal data and contains at least the information and measures referred to in Article 33, paragraph 3, letters b) , c) and d).
3. The communication to the interested party referred to in paragraph 1 is not required if one of the following conditions is met:
 - a) the data controller has put in place the appropriate technical and organizational protection measures and these measures had been applied to the personal data subject to the violation, in particular those intended to make the personal data incomprehensible to anyone who is not authorized to access it, such as encryption;
 - b) the data controller has subsequently taken measures to prevent the occurrence of a high risk for the rights and freedoms of the data subjects referred to in paragraph 1;
 - c) this communication would require disproportionate efforts. In this case, a public communication or a similar measure is carried out, through which the interested parties are informed with similar efficacy.
4. In the event that the data controller has not yet communicated the personal data breach to the data subject, the supervisory authority may, after assessing the probability that the personal data breach presents a high risk, provide for it or may decide that one of the conditions referred to in paragraph 3 is met.

To exercise the rights indicated above, or to send communications and / or requests in relation to the processing of personal data, you can contact P.F.B. Srl to the following email address: privacy@pfb.it .