



**PRIVACY POLICY STATEMENT ON THE PROCESSING OF PERSONAL DATA OF THE CUSTOMERS WITHIN THE MEANING OF ARTICLE 13 OF
REGULATION (EU) 2016/679**

Pursuant to article 13 of Regulation (EU) 2016/679 and in relation to your personal data of which Vallée Trafor S.r.l. will come into possession, we provide you with the following privacy policy statement:

- 1. Controller of the processing.** The data controller is *Vallée Trafor S.r.l.* with seat in Aosta, Via Lavoratori Vittime del Col du Mont n. 50 (C.F. e P.IVA: 01180360073).
- 2. Data processor at the seat of Vallée Trafor S.r.l.** The *Executive Assistant*, Miss Deborah Luboz, has been appointed as Data Processor at the seat of Vallée Trafor S.r.l. in accordance with the provisions of article 28 of the GDPR 2016/679. Her contacts can be found on the company's website www.valleetrafor.it.
- 3. Persons authorized to process the personal data.** Vallée Trafor's employees who process personal data have been authorized by the data controller in accordance with the provisions of article 29 of the GDPR 2016/679. The authorizing act contains specific instructions and restrictions, according to nature of duties, concerning how to carry out the activities and which type of personal data process.
- 4. Third parties (processors).** When carrying out its activities Valle Trafor S.r.l. could make use of third parties (for example legal or tax advisers). In accordance with the provisions of article 28 of the GDPR 2016/679 the processing activities carried out on behalf of Vallée Trafor S.r.l. are governed by a contract that is binding on the processor with regard to the controller and that sets out the subject-matter and duration of the processing, the nature and the purpose of the processing, the type of personal data and categories of data subjects, the obligations and rights of the controller. Vallée Trafor S.r.l. use only processors providing sufficient guarantees to implement appropriate technical and organizational measures in such a manner that processing will meet the requirements of the GDPR 2016/679 and ensure the protection of the rights of the data subject.
- 5. Purposes of data processing.** Your personal data may be processed, without the need for your consent, in cases where this is necessary in order to fulfill any legal obligation in the following areas, private law, tax law, anti-money laundering discipline, as well as any other European provision, rules, codes or procedures approved by the Authorities and other national competent institutions. Furthermore, your personal data may be processed in order to follow up requests from the competent administrative or judicial authorities and, more generally, from public entities in compliance with legal formalities. Your personal data will also be processed for the purposes related and / or linked to the activities which are carried out by the controller, such as:
 - to carry out the shipment of the final product;
 - to consider or agree amendments on project or contract terms, on date or place of dispatch, etc.;
 - in order to supply the customer with technical assistance, when provided for in the contract;
 - for the performance of the contractual relationship and any service which is ancillary and/or related to such contracts. In such cases, we inform you that, according to the applicable legislation regarding personal data, the acquisition of your consent is not required when the processing is necessary to fulfill obligations arising from a contract;
 - for the management of payments (with the related processing - according to the law - of payment data, including credit card or prepaid card identification details) of the requested services and of any ancillary financial burden, in accordance with the provisions of the contract or the fulfillment of legal, accounting, fiscal, administrative and contractual obligations related to the provision of the requested services;
 - for the analysis and improvement of the provided services, such as the possible conduct of soundings in order to obtain suggestions from the customers;
 - Your personal data may also be processed, provided that you give your optional and separate expressed consent, for the following additional purposes functional to the activity of the Controller: marketing of the services of the Controller, sending of advertising/informative/promotional material.

Furthermore, your personal data may be processed:

- for the defense of a right in court or whenever it is necessary for the purpose of ascertaining, exercising or defending a right of the Controller;
- to respond to requests by administrative or judicial authorities and, more generally, by public entities in compliance with legal formalities;
- for the realization of extraordinary operations and lease or sale of companies, in favor of other contractually involved parties.

ValleeTrafor S.r.l.

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6. **Lawfulness of processing.** The processing of your personal data by Vallée Trafor S.r.l. is executed in accordance with article 6, paragraph 1, letters b) and c) GDPR 2016/679 (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 and for compliance with a legal obligation to which the controller is subject. In reference to the processing finalized to the circulation of advertising material on Vallée Trafor's products and/or services the lawfulness of processing is based on the consent of the data subject (article 6, paragraph 1 letter a) of GDPR 2016/679. The provision of the data is optional; however, any refusal to supply data in whole or in part may not allow the formalisation or the execution of the contract. By contrast the failure to consent to the circulation of advertising material on Vallée Trafor's products and/or services has no effect on the formalisation or the execution of the contract.
7. **Record of processing activities.** In accordance with the provisions of article 30 of the GDPR 2016/679, Vallée Trafor S.r.l. maintains a record of processing activities. The record contains: the name and contact details of the controller, the name and contact details of the Data Processor at the seat of the company; the purposes of the processing; a description of the categories of data subjects and of the categories of personal data, the categories of recipients to whom the personal data have been or will be disclosed; transfers of personal data to a third country or an international organization and, in the case of transfers referred to in the second subparagraph of article 49 of the GDPR 2016/679 the documentation of suitable safeguards; the envisaged time limits for erasure of the different categories; a general description of the technical and organizational security measures referred to in article 32 of the GDPR 2016/679.
8. **Communication of data.** Personal data may be disclosed to the subjects in charge of the processing and it may be communicated - for the purposes referred to in point 5 - to Public Bodies, consultancy and assistance providers, to banks, to Vallée Trafor's employees authorized to process personal data in accordance with the provisions of article 29 of the GDPR 2016/679 and, more generally, to all those public and private subjects to whom communication is necessary for the correct fulfillment of the purposes indicated in point 5 or on account of legal obligations.
9. **Transfer of data abroad.** Personal data may be freely transferred outside the national territory to other countries in the European Union or outside the European Union. With regard to transfers outside the territory of the European Union to countries that are not considered appropriate by the European Commission, the Controller shall take suitable and appropriate security measures in order to protect the received personal data. Consequently, any transfer of data to countries outside the European Union, in any case, shall take place in compliance with suitable and appropriate guarantees for the purpose of the transfer, such as the standard data protection contractual clauses, pursuant to the applicable legal discipline and, specifically, to articles 45 and 46 of the Privacy Regulation.
10. **Methods of processing and retention.** The data processing will be carried out in an automated and/or manual way, in compliance with the provisions of article 32 of the GDPR 2016/679 concerning security measures, by specifically appointed subjects and by external consultants, in compliance with the provisions of art. 29 GDPR 2016/679. Please note that, in compliance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 GDPR 2016/679, your personal data will be retained for the necessary period of time for the achievement of the purposes for which they were collected and processed, and in order to comply with the obligations and requirements of provided by law.
11. **Data dissemination.** The data of the interested party will not be disclosed.
12. **Personal Data breach.** Vallée Trafor S.r.l. has planned specific procedures in case of personal data breach
13. **Cloud and telematics systems.** Personal data may be stored and/or used and/or sent/exchanged in online mode and the related programs (for example Dropbox, Outlook or other cloud and mailing programs), exclusively for the purposes set out in this statement.

RIGHTS OF THE DATA SUBJECT

- I. **Right to access personal data (article 15 of the GDPR 2016/679).** The data subject has the right to ask the data controller, Vallée Trafor S.r.l., 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 informations: the purpose of the processing; the categories of personal data concerned; the recipients or categories of recipient to whom the personal data have been or will be disclosed, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period, 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; the existence of the right to lodge a complaint with a supervisory authority.
- II. **Right to rectification (article 16 of the GDPR 2016/679).** The data subject has the right to obtain the rectification of inaccurate personal data concerning him from the data controller without undue delay. Having considered the purposes

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of the processing, the data subject has the right to obtain the integration of incomplete personal data, also by providing a supplementary statement.

- III. **Right to erasure or “right to be forgotten” (article 17 of the GDPR 2016/679).** With the exception of the cases provided for by article 17, paragraph 3 of Regulation (EU) 2016/679, the data subject has the right to obtain the deletion of personal data concerning him from the data controller without undue delay and the data controller has the obligation to erase personal data without undue delay, when one of the cases provided for in article 17, paragraph 1, of Regulation (EU) 2016/679 occurs.
- IV. **Right to restriction of processing (article 18 of the GDPR 2016/679).** The data subject has the right to obtain the restriction of the processing from the data controller using one of the hypotheses provided for in article 18 of Regulation (EU) 2016/679.
- V. **Right to data portability (article 20 of the GDPR 2016/679).** The data subject has the right to receive, in a structured, commonly used and automatically readable format, the personal data concerning him / her that have been given to a data controller and has the right to transmit such data to another data controller without any opposition of the data controller to whom they were given only in the cases provided by law and without prejudice to the rights and freedoms of others.
- VI. **Right to object to the processing (article 21 of the GDPR 2016/679).** The data subject has the right to object at any time, for reasons connected with his particular situation, to the processing of his personal data pursuant to article 6, paragraph 1, letters e) or f) of Regulation (EU) 2016/679. 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 data subject or for the assessment, exercise or the defense of a right in court.
- VII. **Withdrawal of consent.** If the treatment is based on article 6, paragraph 1, letter a), or on article 9, paragraph 2, letter a) of Regulation (EU) 2016/679, the data subject has the right to withdraw his consent at any time without prejudice to the lawfulness of the processing based on the consent that was given prior to the withdrawal.
- VIII. **Right to complain.** The data subject has the right to lodge a complaint with the Italian Supervisory Authority following the instructions set out in the Authority website www.garanteprivacy.it.

You can exercise your rights with a written request sent to the attention of the executive assistant by registered mail to the registered office of Vallée Trafor S.r.l. in Aosta, Via Lavoratori Vittime del Col du Mont n. 50 or to the PEC address: valletrafor@legalmail.it. Time to reply is 1 month which ValléeTrafor S.r.l. may be extended to 3 months in case of particular complexity (assessed by the data controller Vallée Trafor S.r.l.).

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