

**PRIVACY POLICY** – The privacy policy is provided pursuant to art. 13 and 14 of EU Reg. 2016/679 GDPR

The privacy policy is provided pursuant to art. 13 and 14 of EU Reg. 2016/679 (European Regulations for the protection of personal data, GDPR) and of the national legislation on personal data protection. The privacy policy is also based on the provisions of Directive 2002/58 / EC, as updated by Directive 2009/136 / EC, on Cookies as well as the provisions of the Provision of the Authority for the protection of personal data of 08.05. 2014 concerning cookies.

In accordance with the provisions of EU Reg. 2016/679 we inform you that the management of your data and their safety must be guaranteed with the utmost care, in accordance with the requirements of that legislation privacy. The information is not intended to be valid for other web sites accessible through links provided on the websites of the domain holder, which is not considered in any way responsible for the websites of third parties.

#### SPECIFIC INFORMATION

Informative specifications may be submitted on the Website in relation to particular services or processing of Data provided.

#### COOKIES

For more information on the cookies used by this website, see the cookies policy

**DATA CONTROLLER** pursuant to artt. 4 e 24 of GDPR 679/2016 of the web site [www.poncial.it](http://www.poncial.it) è PONCIAL MALCOTTI Srl Via I Maggio, 11 - 38089 - Storo (TN) Italia of its pro tempore representative, Tel/Phone 0465 686969 , e-mail: [privacy@poncial.it](mailto:privacy@poncial.it)

**DATA PROCESSOR**, The list of data processors pursuant to articles and 28 of EU Regulation 2016/679 is constantly updated and available by writing to [privacy@poncial.it](mailto:privacy@poncial.it) or at address administrative and operational in Via I Maggio, 11 - 38089 - Storo (TN) Italia

#### LEGAL BASIC PURPOSE FOR THE ELABORATION OF YOUR PERSONAL DATA

If you come from the European Union, the legal basis for the collection and use of personal information described in this Privacy Policy depends on the personal data we collect and on the specific context in which it is collected. PONCIAL MALCOTTI Srl can process your personal data in the following cases:

- Because we must execute a contract with you
- Because you gave us consent to do it
- The treatment is in our legitimate interests and is not superior to your rights
- For processing payments
- To comply with the law

#### DESTINATION AND CATEGORIES OF DATA PROCESSED

Personal data collected will be communicated to persons who will process the data in their capacity as data processors (art. 28 del Reg. UE 2016/679) and/or in their physical capacity acting on behalf of the Controller or the Processor, for the reasons above listed. More specifically, the data will be transmitted to:

- to the sales/distribution network within the territory;
- persons who provide IT management services and their communications networks (including email) ;
- firms of companies who provide assistance and consultancy;
- competent authority for compliance with legal obligations and/or provisions of public bodies upon request; for accounting and administration purposes, data could be communicated to business information service to verify solvability and ability to meet financial commitments and/or to persons appointed for debt recovery purposes. Persons pertaining to these categories will be appointed Data Processors or will operate autonomously as data Controllers. The list of persons responsible for processing data will be updated and will be available upon request by email [privacy@poncial.it](mailto:privacy@poncial.it) or at address administrative and operational in PONCIAL MALCOTTI Srl Via I Maggio, 11 - 38089 - Storo (TN) Italia

#### TRANSFER OF DATA TO ANOTHER STATE AND/OR INTERNATIONAL ORGANISATION AND GUARANTEES.

Personal data collected will be transferred to Countries within the EU and countries outside the EU in order to achieve the scope described above. Data will be transferred pursuant to Article 44

- General Principles for transfer of data; Article 45
- Transfer on the basis of an adequacy decision; Article 46
- Transfers subject to appropriate safeguards, more specifically data will be transferred:
  - to third party state or international organisations which the Commission deems adequate (art. 45 EU Reg. 2016/679)
  - to third party states or international organisation which have provided adequate guarantees or on condition that enforceable data subject rights and effective legal remedies for data subjects are available. (art. 46 Reg. EU 2016/679, even by means of contract clauses and other provisions pursuant to article 46, paragraph 3)
  - to third party states or international organisations in terms of binding corporate rules which form part the same group (art. 47 EU Reg. 2016/679) -to third party international organisation on the basis of derogations for specific situations (art. 49 EU Reg. 2016/679) The data subject may obtain information regarding guarantees for transfer of data via email at the address [privacy@poncial.it](mailto:privacy@poncial.it)

#### FOR HOW LONG WE WILL TAKE YOUR DATA OR CRITERIA TO DETERMINE THE PERIOD

We will keep your personal data only for the time necessary for the purposes indicated in this privacy policy. We will be retained and used your personal data to the extent necessary to fulfill our legal obligations (for example, if we are required to keep your data to comply with applicable laws), to resolve any disputes, to apply our agreements and our legal policies. We will also retain usage data for internal analysis purposes. Usage data is generally kept for a shorter period of time, except when this data is used to enhance security or to improve the functionality of the service, or we are obliged to keep it for law for longer periods of time.

#### HOW YOU CAN EXERCISE YOUR RIGHTS ?

You may exercise your right pursuant to EU Regulation 2016/679, by referring to the data Controller, sending an email to the email address [privacy@poncial.it](mailto:privacy@poncial.it) or by writing to the Data Controller as above indicated.

You have the right at any time to request the Controller to grant access to Your personal data (article 15), to rectify data (article 16) and to cancel data (art 17) or to limit processing of data (art 18) Revocation of consent: Processing of personal data is not grounded on consent by on legitimate interest; if processing is based on consent, you have the right to revoke consent at any moment without effecting the lawfulness of processing based on consent expressed prior to revocation; To object to processing of data or to exercise other rights you may right to [privacy@poncial.it](mailto:privacy@poncial.it). You have the right to object to the supervisory authority; Communication of personal data is a contractual obligation. Failure to provide information will make it impossible to enter into the agreement. There is no automated decisional process in place

#### I STILL HAVE ANY QUESTIONS

For further information on this information or on any matter of privacy, or if you wish to exercise your rights or withdraw your consent, you can contact directly the references indicated in the section "Who will process my data". For more information you can send mail to [privacy@poncial.it](mailto:privacy@poncial.it)

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