



Privacy policy

Pursuant to Article 13 of Italian Legislative Decree of 30 June 2003 no. 196 ("Personal data protection code", hereinafter referred to simply as the "Law") and European Regulation no. 2016/679, we wish to inform you:

- 1) that **the personal data** provided by you to GIMA SPA are processed in compliance with the aforementioned legislation and the confidentiality obligations set forth therein;
- 2) that **the processing of personal data shall be understood as**: "any operation or set of operations, which is performed upon personal data or sets of personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, extraction, consultation, use, disclosure by supply, dissemination or otherwise making available, comparison or interconnection, blocking, erasure or destruction" (article 4 of EU Regulation).
- 3) processing is carried out using automated and non-automated means, with access controlled and in accordance with the procedures laid down by the Law;
- 4) that **the data is collected in our *database* / *paper archive* and recorded** in such a way that only personnel authorised by GIMA SPA are allowed access: or the data may be processed, respecting the purposes indicated below, within GIMA S.P.A
- 5) that **the data may be disclosed to third parties** with regards to:
GIMA SPA business partners (manufacturing companies, suppliers, carriers and shippers, etc.).

Data processing is carried out using tools that guarantee security and confidentiality in accordance with Italian Presidential Decree no. 318/1999 with controlled access limited to authorised personnel.

Policy changes

This Policy may be amended or updated at any time by GIMA S.P.A

Data controller

The data controller is: GIMA S.P.A, Via G. Marconi, 1, 20060 Gessate (MI).

Data and purpose of processing

Data is processed for institutional purposes, related or instrumental to the activity of GIMA S.P.A, such as archiving, processing, invoicing, customer management and, moreover:

- a)** to comply with legal obligations related to civil, fiscal and accounting regulations, for the purposes of administrative management of the relationship established by you with GIMA S.P.A;
- b)** to comply with contractual, technical support and technical information, post-sales assistance and customer satisfaction obligations for the products of interest to you;
- c)** for the communication of commercial information on future business initiatives, announce new products, services and offers, by GIMA S.P.A. Communications relating to marketing activities may take



place through the use of traditional methods (e.g., post, phone calls with operator), automated methods (e.g., phone calls without operator) and similar (e.g. fax, e-mail, SMS , newsletter).

The sending of advertising e-mails will in no case determine the transfer of personal data to third parties.

Unless expressly objected to, the Data Controller may continue to send **its customers** commercial communications relating to services similar to those they are already using. **For prospective customers**, the data processing referred to in point c) will only be possible with the express consent of the interested party.

d) in addition, personal data will be processed to regulate the following contractual relationships:

- employment contracts,
- internship contracts,
- supply contracts

Processing method

Data processing will be carried out pursuant to art. 4 no. 2) of the General Data Protection Regulation (GDPR), by means of the following operations: collection, recording, organisation, storage, consultation, processing, alteration, selection, extraction, comparison, use, interconnection, blocking, communication, erasure and destruction of data.

The data will be subjected to both paper and electronic and / or automatic processing.

The data, upon receipt / updating, will be kept for a period consistent with the processing purposes described above, and as defined in the following table:

Applicants	Maximum 24 months from collection	art. 11 letter e) of Italian Legislative Decree 196/2003 (in the process of being repealed, we are awaiting indications from the Guarantor) and art. 5 letter e) of the EU Reg 2016/679.
Employees and staff leasing workers	at least 10 years	art. 43 of Italian Presidential Decree 600/73; art. 2946 of the Italian Civil Code on ordinary requirements; Title I, Chapter III, of Italian Legislative Decree 81/08 and subsequent amendments and additions



Customers and suppliers	10 years from termination of the contractual relationship	art. 2948 of the Italian Civil Code which provides for a term of 5 years for periodic payments; art. 2220 of the Italian Civil Code which provides for retaining accounting records for 10 years; art. 22 of Italian Presidential Decree 29 September, 1973, n.600
Data for marketing purposes	Until the withdrawal of consent or until the right to object is exercised.	art. 23 of Italian Legislative Decree 196/03; General Measure of 15/05/13; art. 21 of EU Reg. 2016/679
Video surveillance images	7 days	art. 23 of Italian Legislative Decree 196/03; General Measure of the Guarantor; art. 21 of EU Reg. 2016/679
Cookies	Maximum 6-12 months	art. 23 of Italian Legislative Decree 196/03; General Measure of the Guarantor; art. 21 of EU Reg. 2016/679
System administrators LOG	minimum 6 MONTHS	art. 23 of Italian Legislative Decree 196/03; General Measure of the Guarantor; art. 21 of EU Reg. 2016/679
Browsing data	last 10 sites visited	art. 23 of Italian Legislative Decree 196/03; General Measure of the Guarantor; art. 21 of EU Reg. 2016/679

The data will be stored at the GIMA Spa offices or at external suppliers authorised for processing.

Data communication and transfer

The data processed will not be disclosed; however, it may be communicated by GIMA SpA to third parties for the purposes indicated in this privacy policy, including to business partners, consultants and freelancers, banks and credit institutions, insurance companies, financial, factoring, leasing, service, loan management and recovery companies, auditors, debt collection companies, public bodies, auditing or supervisory bodies, in order to comply with obligations arising from the law, regulations, EU regulations or for aspects concerning the management and execution of the past or present legal relationship with you.

The data will be processed by the following personnel:

- Employees of the company GIMA SpA, who work as personnel authorised to process data according to the tasks performed and are adequately trained.
- External Managers pursuant to art. 28 of the GDPR.

The list of Managers responsible for processing personal data is available at the GIMA SpA headquarters at 1 via Marconi, Gessate (Milan).



For all the purposes indicated in this privacy policy, the data may also be communicated abroad, inside and outside the European Union, in compliance with the rights and guarantees provided by the current legislation, subject to verification that the country in question guarantees an "adequate" level of protection in accordance with the provisions of the GDPR.

Rights of the interested party

It should be noted that, as an interested party, at any time you may request:

- a) access to personal data;
- b) their correction in case of inaccuracy;
- c) erasure;
- d) the limitation of processing;
- e) the right to object to the processing of data where the conditions apply;
- d) the right to data portability, i.e. to receive, in a structured, commonly used format and legible by automatic devices, the personal data provided.

For matters not expressly provided for by the provisions referred to above, reference should be made to the legislation in force on the subject of Privacy and more specifically to articles 15, 16, 17, 18, 20 and 21 of the GDPR.

Withdrawal of consent

Consent may be withdrawn at any time, however in the event that this does not:

- Prejudice the lawfulness of processing based on consent given prior to its withdrawal;
- Prejudice further processing of the same data based on other legal bases such as contractual or legal obligations.

For further information on this privacy policy or on any issues relating to privacy, or in the event that you wish to exercise the rights referred to above or withdraw consent, write to gdpr@gimaitaly.com