

**GDPR**  
**UE Regulation n. 679**  
**as on 27 April 2016**  
**Personal Data Processing**  
**ex art. 13**

Dear Client/ Supplier

La Metallurgica S.r.l., registered office in Milan, Via Giannone n.9 and production plant in Albignano D'Adda, Via Cassanese Nord n. 35, here represented by, Ing. Luigi Bianchi, acting in his role as the Company Legal Representative and Data Controller, as per art. 13 of the 2016/679 UE Regulation (GDPR), is providing you with the following information concerning the processing of your personal data, for all the purposes foreseen by the abovementioned Regulation.

La Metallurgica S.r.l. safeguards the privacy of users browsing its website, [www.lametallurgica.it](http://www.lametallurgica.it), by adopting all the necessary measures aimed at protecting personal data as foreseen by the law. The document herein describes the way such data provided by the website users are processed along with personal data.

Personal data collected through the Site will be processed in compliance with the aforesaid Regulation and with the privacy law.

**a) Data Controller**

LA METALLURGICA S.R.L. registered office in Milan, Via Giannone n. 9 and production plant in Albignano D'Adda (Mi), Via Cassanese Nord 35 – company registration number 13188310158, is here represented by its Legal Representative and Data Controller Ing. Luigi Bianchi.

All claims and requests concerning the data processing system may be addressed to the Data Controller:

Ing. Roberto Bianchi, whose address for the fulfillment of his service shall be the one of the Company (mail: [privacy@metallurgica.it](mailto:privacy@metallurgica.it)).

**b) Place of processing**

All processes related to the services provided by the Website herein are carried out by authorized staff only at the premises of the Data Controller's Company.

All personal and sensitive data contained in the service as authorized by users, shall not be transferred and disclosed to any Third Parties.

All personal data provided by users sending requests for marketing materials will be used only for the purpose of fulfilling such request or providing the requested service and will be disclosed to third parties only if necessary.

The optional, explicit and voluntary use of the email addresses listed herein imply the consequent collection, by the Company named "La Metallurgica S.r.l.", of senders' email addresses, needed to reply to senders' requests (including any possible marketing materials to be sent to inform senders about the Company products/services) along with other relevant personal data.

All such personal data shall be provided on a voluntary base.

Failure to provide all or part of such data by the Site users, will lead to the partial or total impossibility to fulfill the purposes described herein and to satisfy the users' requests forwarded through the Site.

Any further information, collected by the Company named "La Metallurgica S.r.l.", may be supplied automatically upon signing in.

We are talking about a selection of data which are not collected to be matched with a list of previously identified individuals; however, due to the nature of such data, they may be used to identify users, if processed by means of processes and matching systems applied to data belonging to third parties.

Personal data provided, collected and made available at the Company named "La Metallurgica S.r.l." will be processed digitally and analogically.

The purpose of data concerning your company, requested or collected previously to the establishment of the ongoing rapport with our Company, along with data collected throughout the duration of such rapport, shall be processed for commercial and accounting purposes only, in compliance with the contractual obligations following our agreements and with the law.

#### **c) Processing method**

Data to be processed will be lawfully recorded, sorted and stored inside both digital and paper archives held by the Company at its premises, in compliance with the GDPR with reference to their correctness and confidentiality.

#### **d) Data notification and disclosure**

Such data shall be mandatorily provided since they are needed for the fulfillment of contractual obligations, and for complying with the law and tax regulations.

Failure to provide them may prevent us from fulfilling some of the contractual obligations.

Data may be notified and disclosed, following the current law and regulations, to courier services, forwarding agents and transport companies, to external operators performing specific tasks on behalf of the Company, banks endorsed with cash receipts and payments, law firms and consultancies and financial offices.

#### **e) Rights of the concerned parties**

The concerned parties are entitled to all rights following art. 13 of the GDPR, and more: specifically getting to know the origin of data and the purpose of the processing; the possibility to access such data, ask for their modification, updating, cancellation or correction should they be incomplete or wrong.

La Metallurgica S.r.l. guarantees such rights will be enforceable at any time, in compliance with art. 12 of the GDPR.

More specifically:

- the right to know whether the data holder holds and / or processes data related to the user and access such data at any time even by asking for their copy (art. 15 "**Right of access**");
- the right to modify wrong personal data or to integrate incomplete data (art. 16 "**Right of amendment**");
- right to cancel personal data held by the data Holder, should any of the cases foreseen by the DGPR applies (art. 17 "**Right to cancel data**");
- right to ask the data Holder to process only some data, should one of the reasons foreseen by the GDPR apply (art. 18 "**Right to restrict the processing of data**");
- right to ask and receive all data held by the Holder, in a structured, common, readable digital format, or to have such data promptly and swiftly transferred to another Holder (art. 20 "**Portability right**");
- right to object partially or totally to the use of data for the purpose of sending marketing materials, carrying out market research as per the Consent clause (art. 21 "**Right to object**").
- right to object partially or totally to the automatic or semi-automatic processing of data for profiling purposes (see Consent clause)

Such rights may be enforced by notifying the willingness to do so to the following Data Controller:

Ing. Roberto Bianchi, electing domicile for the purposes of his office at the Company premises (mail: [privacy@metallurgica.it](mailto:privacy@metallurgica.it)).

La Metallurgica S.r.l. also acknowledges users the right to contact, In case of claims, the Privacy Authority for the Protection of Personal Data using the following email address : [garante@gpdp.it](mailto:garante@gpdp.it) or through the website <http://www.gpdp.it>.

#### **f) Data disclosure and notification and subjects accessing data**

Personal data shall not be disclosed but may be notified, for the purpose of providing services, to third parties (such as technical services suppliers, postal couriers, hosting services providers, IT consultancies) who, should it be deemed necessary, may be appointed as Data Controllers by the Company with reference to the technical tasks to be accomplished with the aim of enabling the Company to provide the services thereof.

Data can also be accessed by staff endorsed by the Company named "Metallurgica S.r.l." with the processing of such data (administrative staff, sales people, marketing people, customer service operators, system administrators).

Notwithstanding the right to disclose such data to third parties upon specific and voluntary consent of the data owners.

**g) Data processing and storage**

"La Metallurgica S.r.l." processes personal data by means of digital, automatic systems and only for the time needed for fulfilling the purposes they have been collected for; data will be stored for 12 months after they have been processed, in addition to the time needed for fulfilling legal obligations.

Specific security measures are in place so as to prevent the loss of data, their unlawful or wrong use and unauthorized access to them.

**h) Transfer of data abroad"**

All data collected by "La Metallurgica S.r.l." will be processed within the European Union.

In case, due to technical and/or operative reasons, some operations involving personal data were to be outsourced to third parties located outside the European Union, or in case some data were to be transferred to "cloud" services outside the European Union, the processing of such data will be regulated by point V of the Regulation and authorized on the basis of the related resolutions passed by the European Union. In such cases all the necessary cautionary measures aimed at ensuring maximum protection of the personal data will be applied, and such transfer will be based upon the following: a) assessment of the receiving countries compliance with the privacy law by the European Commission b) guarantees provided by the receiving third party as per art. 46 of the Regulation; c) compliance with the *Corporate binding rules*.