

Customer Information

Data Controller

DOLPHIN PACK SRL

VIA ALESSANDRO VOLTA, 13 – 37010 AFFI (VR) - ITALY

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HOW WE USE YOUR DATA

(Art. 13 and 14 of EU Regulation 2016/679)

Dear Customer,

We would like to provide you certain necessary information regarding the methods and purposes relating to the processing of your personal data.

1. Nature and submission of the data

The submission of your personal data to DOLPHIN PACK SRL is required to be able to perform under the contract/engagement. Therefore, should you refuse to provide the necessary data, the contract/engagement cannot be performed, or it shall terminate due to your act/omission and fault.

2. Processing purposes

Please note that your personal data shall be used for the following processing purposes:

- Accounts receivable (Quotes, Contracts, Orders, DDT, POA, Billing Statement, Invoices), Data-retention period: 10 Years
- General accounting and VAT management, Data-retention period: 10 Years
- Submission of deposit slips and bank advances, Data-retention period: 10 Years
- Managing financial statements and reports (for the period / consolidated), Data-retention period: 10 Years
- Production planning and controls (manufacturing, service sector, and wine-growing), Data-retention period: 10 Years
- Managing customer receivables and collections, Data-retention period: 10 Years
- Direct marketing, Data-retention period: 10 Years
- Drafting and online submission of invoice-data notices, Data-retention period: 10 Years
- Management of inventory ledgers, Data-retention period: 10 Years
- Drafting and online submission of Intrastat Form, Data-retention period: 10 Years
- Assistenza clienti, Data-retention period: 10 Years
- CRM Clienti acquisiti (Offerte), Data-retention period: 10 anni dalla cessazione del rapporto commerciale
- Gestione piattaforma FTE, Data-retention period: 1 Years
- Manutenzione Software Gestionale, Data-retention period: Per la durata dell'intervento di manutenzione
- Gestione news letter Clienti, Data-retention period: Per la durata del rapporto commerciale fino a cancellazione
- Manutenzione Hardware, Data-retention period: Per tutta la durata dell'intervento di manutenzione

- Revisione logistica aziendale, Data-retention period: 2 Years relating to the discharge of duties imposed by statute or contract:

- Processing for contract performance to which the Data Subject is privy, or pre-contractual measures on the same
- Processing for compliance with a legal duty to which the Data Controller is subject

Data Controller DOLPHIN PACK SRL shall process your personal data solely to the extent they are indispensable to the purpose(s) stated *supra*, in accordance with applicable data-protection laws, and in accordance with the provisions of any general authorisations issued by the Data Protection Authority.

3. Method of processing

The data subject's personal data, to wit:

- Name, Tax ID number, VAT number, contact information, e-mail, credentials, other identifiers - Category of data: Identifiers - Personal data: common
- Economic and financial data - Category of data: Economic - Personal data: common
- Bank information - Category of data: Court-related - Personal data: common
- Work-related data - Category of data: Race / ethnic origin - Personal data: common

shall be handled using a very high security level. All safeguards required under data-protection and other applicable law, as well as those selected at Data Controller's discretion, have been implemented. More specifically, your data shall be processed using:

- Technological physical, Server
- Technological physical, Computer desktop
- Technological physical, Notebook
- Technological physical, SIR cloud area

The data shall be processed by the following authorised categories of parties:

- External Data Supervisor/Vice Supervisor: Agenzia commerciale, Commercialista, Manutentore HW, Manutentore SW, Manutentore SW e Gestione piattaforma FTE
- Internal Data Processor

4. Data disclosure and transfer

The data collected by the Data Controller may be disclosed, in addition to those parties identified *supra*, to:

- All categories of entities disclosure to whom is strictly necessary, functional, and compatible with the legal basis on which the processing of your data is predicated:
 - Internal Revenue Agency
 - Banks, credit institutions, post offices
 - Chambers of commerce, industry, trade, and agriculture
 - Customs Agency
 - Interchange system ("SDI")
 - Professionals outside our organisation, where disclosure is obligatory to carry out the engagement entrusted to us (e.g. notaries, qualified accountants, auditing firms, HR consultants)

As part of the processing performed by the aforementioned parties, your data shall not be transferred outside of Italy

If strictly necessary for the purposes stated *supra*, such processing may also involve the Data Subject's images (photographs, videos, audio-visual footage,...). The processing of such images shall take place in compliance with applicable law, with total assurances that the Data Subject's anonymity be maintained by masking their features. Data Subject's express consent - including as may be required under copyright law - shall be required for any image processing given that (on an exceptional basis) images of a person with his/her face obscured may nevertheless allow such person to be identified.

5. Automated decision-making and profiling

Your data shall not be processed:

- through the use of automated decision-making processes
- using any profiling technology

6. Rights of the Data Subject

As Data Subjects, you have the rights set forth in sections 2, 3 and 4 of Title III of EU Regulation 2016/679 (e.g. to ask any of the following of Data Controller: access to personal data, the correction/deletion of the same; limiting processing on your data; objecting to processing). Data Subjects have the following specific rights:

- Obtain confirmation from Data Controller on whether any processing is being conducted on your personal data, and in such cases, access such data and the information required under Art. 15 of EU Regulation 2016/679;
- Obtain the correction of any inaccurate personal data from Data Controller;
- Secure the deletion of your personal data where they are not longer needed given the purpose for which they were gathered or otherwise processed, or where any other condition under Art. 17 of EU Regulation no. 679/2016 has been met, and provided the conditions under Art. 17, paragraph 3, of EU Regulation no. 679/2016 have not been met;
- Require the Data Controller to limit processing where: (a) the data subject disputes the accuracy of the personal data in question, for the period needed by the Data Controller to determine the accuracy of such personal data; (b) the processing is unlawful but the Data Subject him/herself objects to deletion, and wishes instead for limits to be imposed, or requests that such data be processed to adjudicate or defend his/her rights in a court of law;
- Receive their personal data in a structured, commonly used, and machine-readable format; should the Data Subject exercise such right, he/she shall have the option to ask the Data Controller to submit the aforementioned data directly to another Data Controller;
- Object to the processing of their personal data where the criteria under Art. 21, paragraph 2, of EU Regulation no. 679/2016 have been met.
- Lodge a complaint with the supervisory entity. With respect to such personal data, the Data Subject may contact:

Data Controller

DOLPHIN PACK SRL

VIA ALESSANDRO VOLTA, 13 – 37010 AFFI (VR) - ITALY

Tax ID 02332040233 - VAT no.02332040233

7. Data Retention

The personal data you provide us shall be retained for purposes of rendering the agreed-upon service and shall be retained for the time necessary to complete the same. Retention may take place using:

- Recording within Data Controller's (and its processors/supervisors) hardware system;
- Archiving pursuant to the Code of Digital Administration; in such cases, Data Controller shall only be subject to accredited parties pursuant to Art. 29 of the CDA where such archiving does not take place directly within its software systems.

AFFI, 22/03/2019

(Signature in acknowledgement of policy)