



INFORMATION ON THE PROCESSING OF PERSONAL DATA RELATED TO THE RELATIONSHIP WITH CUSTOMERS AND POTENTIAL CUSTOMERS

The following information is intended for natural persons, including professionals, owners of individual businesses and representatives/contacts of companies, entities, associations and foundations, hereinafter "Data Subjects".

Identity and contact details of the Data Controller

Gruppo Bisaro – SIFA s.r.l., hereinafter also "Gruppo Bisaro - SIFA" or "Data Controller" with registered office in via Kechler, 6 – 33095 – San Giorgio della Richinvelda (PN), and contactable at the e-mail address sifa@gruppobisaro.it, at the Certified E-mail Address sifa@legalmail.it or by calling 39 0427 96756.

Data categories and their source

Gruppo Bisaro – SIFA s.r.l. processes personal data of a common nature (e.g. personal data, contact data, data relating to work activities): this information may be collected from the subject to whom it refers and/or from third parties (e.g. commercial agents, commercial information companies).

Purposes and legal bases

- A. Management of the pre-contractual phase:** personal data are processed for all requirements related to the fulfilment of requests for information and/or estimates.
- B. Collection of business information:** personal data are processed to collect information for checks on the economic, financial and capital situation of data subjects, as well as on their solidity, solvency and reliability.
- C. Management of the contractual phase:** personal data are processed for all requirements related to management of the contractual relationship in all its phases (e.g. management of appointments, organisation of logistics, management of customer support activities and fulfilment of regulatory obligations for which the Data Controller is responsible).
- D. Defensive purposes:** The Data Controller may need to process personal data for the management of out-of-court or judicial disputes and litigation.

Purpose	Legal basis (common data)	Legal basis (special data)
A.	Execution of pre-contractual measures.	/
B.	Legitimate interest of the Data Controller connected to the analysis and definition of business strategies and policies, to the identification of suitable subjects for the initiation or continuation of commercial relationships, to the methods and conditions of payment and to the fight against fraud.	/
C.	Execution of the contract; Fulfilment of legal obligations.	/
D.	Legitimate interest of the Data Controller to ascertain, exercise or defend a right.	To ascertain, exercise or defend a right.

Retention period

Purpose	Retention time
A.	Time required to process requests received and subsequent communications.
B.	Time needed to perform the checks.
C.	10 years from the termination of the contract.
D.	10 years from the final resolution of the dispute.

Nature of the provision and consequences in case of refusal

Purpose	Nature	Consequences
A.	Necessary	Impossibility of receiving the requested information.
B.	Not applicable	/
C.	Necessary	Impossibility of initiating or continuing the business relationship.
D.	Necessary	Impossibility of managing litigation.

Scope of communication

The data are processed by internal personnel authorised for specific tasks and are communicated externally according to the following rules

Purpose	External recipient categories
A.	Companies belonging to the same business group, agents, commercial consultants, business brokers.
B.	Companies belonging to the same business group, commercial information companies, agents.
C.	Companies belonging to the same business group, insurance or credit transfer companies, agents, credit institutions, external consultants, subjects to whom communication is mandatory by law, commercial partners (customers/suppliers).
D.	Law firms; debt collection or assignment companies; Judicial authorities.



As the data is also processed with IT tools, it may also be visible to those persons who perform assistance/maintenance on such systems.

Transfer of data to a third country or to an international organisation

The Data Controller does not transfer personal data outside the European Economic Area.

Rights of Data Subjects

The subject to whom the personal data refer is recognised the following rights:

Access: it is possible to find out whether personal data is being processed and, if so, to obtain access to it and request a copy.

Correction: it is possible to request the updating of personal data, their correction (if inaccurate) and the integration of incomplete data.

Deletion: it is possible to obtain the deletion of personal data when certain conditions are met (for further information contact the Data Controller).

Limitation: it is possible to request that the data be marked in order to limit their processing in the future, when certain conditions are met (for further information contact the Data Controller).

Objection: it is possible to object to the processing of personal data, for reasons related to a particular situation, where the processing is based on legitimate interest or is necessary for the performing of a task of public interest or connected to the exercise of public authority vested in the Data Controller.

Portability: it is possible to receive in a structured format the personal data provided to the Data Controller and request to transmit them to another data controller if the processing is based on consent or on the contract and is performed by automated means.

Revocation of consent: it is possible to revoke consent for the purposes that required it, without prejudice to the lawfulness of the processing performed up to that point.

The rights that can be exercised in concrete terms with respect to the processing activities performed are:

Purpose	Exercisable right						
	Access	Correction	Deletion	Limitation	Objection	Portability	Revoke consent
A.	X	X	X	X			
B.	X	X	X	X	X		
C.	X	X	X	X		X	
D.	X	X	X	X	X		

To exercise the above rights, it is possible to use the form available at the link <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and send it to the following address: privacy@sifasrl.it. The data subject may request, at the same address, to obtain further details in relation to the information set out above (e.g. legitimate interest balancing test or the list of data controllers).

It is possible to lodge a complaint with a Supervisory Authority: for Italy, the Authority for the Protection of Personal Data (www.garanteprivacy.it).