



Control Cables & Systems

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## PRIVACY POLICY - ARTICLES 13-14, GDPR UE/2016/679

The UE/2016/679 EU Regulation (hereinafter referred to as “Regulation”) lays down rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data. In compliance with the principle of transparency provided for in art. 5 of the Regulation, Cofle S.p.a., as Controller of data processing, shall provide the information as required by articles 13 and 14 of the Regulation.

### Purposes of data processing

Data will be processed correctly, legally and with transparency, protecting your privacy, your rights in accordance with the company policy. Company then shall process your data in compliance with the principle of “minimisation”, that is to say it will collect and process data only according to the following purposes:

- Management and implementation of the precontractual obligations
- Management and implementation of the contractual obligations.
- Data entry in the company database in order to follow the implementation of the contract.
- Management of tax and accounting obligations
- Fulfilment of obligations laid down by law, rules and EU legislations

In addition:

- In relation to the purposes of points a), b), c), data processing could be carried out without your consent since it is mandatory for the implementation of the contract you have signed (art. 6.1 point b of the Regulation)
- In relation to the purposes of points d) and e), data processing could be carried out without your consent since it is mandatory for the implementation of legal obligations (art. 6.1 point b of the Regulation)

The supply of personal data is mandatory for the purposes of points a), b), c), d), e). The refusal to supply said information will render Cofle S.p.A. unable to conclude and implement the contract.

### Data processing procedures

Data processing shall be performed through paper form and IT tools in accordance with the provisions regarding personal data protection, particularly, technical and organisation measures referred to in article 32.1 of the Regulation, and in accordance with any protective measure which shall ensure integrity, privacy and availability.

### Data Source

DATA SUPPLIED BY THE SUBJECT	DATA SUPPLIED BY THIRD PARTIES	
All data are directly supplied by the subject	TYPE OF DATA COLLECTED	SOURCE

### Target groups

In relation to the above purposes, your personal data can be transmitted to the following subjects or target groups:

- a) Subjects to which the company has legally to provide data according to tax and accounting rules
- b) Banks;

- c) Logistics companies;
- d) Professionals charged to study and solve legal problems regarding contractual arrangements (i.e. lawyers)
- e) Professionals (both natural and legal persons) charged by the Controller to carry out outsourcing activities (i.e. accountants, consultant)

In addition:

- The supplying of your data to the subjects of letter a) is mandatory by law
- The supplying of your data to target groups of letters b), c), d), e), is necessary to allow the implementation of the contract you signed

Regarding the target groups referred to in points b), c), d), e), the Controller of data processing shall commit to rely only on trusted entities and shall appoint them Processors, former art.28 of the Regulation. The list of Processors is available in Cofle S.p.A and you can access it, following a request to the Controller.

Solely for the above purposes, your data may be processed by employees and / or collaborators of Cofle S.p.A as “persons in charge of the processing” authorized by the Controller in accordance to art. 29 of the Regulation.

Data will not be provided except when required by a law or rule or EU Legislation.

The data controller may transfer his personal data to third countries, namely: Brazil, Turkey and India; the information will concern data referring to legal persons, such data processing is not governed by Regulation 2016/679 / EU. The purposes of the processing are exclusively administrative and accounting nature and the communication channel takes place exclusively through the company VPN line and only with companies that belong to the same entrepreneurial group.

## Storage Period

TYPE OF DATA	STORAGE PERIOD	LEGAL REFERENCES
<ul style="list-style-type: none"> <li>• Identifying data</li> <li>• Contact details</li> <li>• Invoices</li> </ul>	<b>10 years</b> from the end of the contract	<ul style="list-style-type: none"> <li>• Art. 43 D.P.R. 600/73</li> <li>• Art. 2946 of the Civil Code about the ordinary period of limitation</li> </ul>

## Rights of the data subject

Pursuant to articles 15-22 of the Regulation, the Data Subject can exercise anytime his/her rights against the Controller.

Data Subject has always the right of asking:

- To the Company, access to personal data;
- Their rectification in case of inaccuracy;
- Their erasure;
- The limitation of their processing

He has also:

- The right to object the processing if he thinks there is a violation of his rights or his freedom;
- The right to withdraw his consent at any time according the purposes for which the consent is necessary;
- The right to data portability, that is to say the right to receive data in a common structured format which can be read by any automatic device;
- The right to complain to the supervisory authority (Authority for the Protection of Personal Data).

## Identity and contact details of the Controller

The Controller is Cofle S.p.a., address Via del Ghezzo, 54 – 20056 – Trezzo sull’Adda (MI), tel.: 029200201 e-mail: [privacy@cofle.it](mailto:privacy@cofle.it)

## Contact details of the Processor

The appointment of a Processor is not mandatory as required by article 37 of the Regulation.