



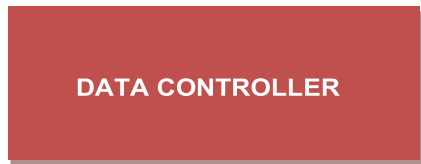
**INFORMATION STATEMENT ON THE PROCESSING OF PERSONAL DATA**  
**www.af-systems.com**

**PURSUANT TO REGULATION (EU) 2016/679 (“GDPR”), (IT.) LEGISLATIVE DECREE 196/2003, (IT.) LEGISLATIVE DECREE 101/2018**

**1. INTRODUCTION**

Pursuant to art. 13 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (“GDPR”), we would like to provide you with the required information on the processing of personal data concerning you (“Data”) performed by AF Systems s.r.l.

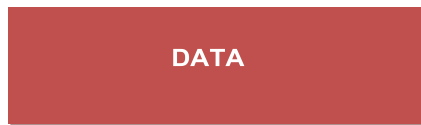
**2. CONTROLLER’S CONTACT DATA**



AF Systems s.r.l.

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(hereinafter “Company”)

**3. PERSONAL DATA PROCESSED**



The term “Data” shall mean the data relating to natural persons processed by AF Systems s.r.l. during the management of the relationships with its interlocutors. Specifically, the following types of data will be processed for the relationships with the users of the website [www.af-systems.com](http://www.af-systems.com)

**4. PURPOSE OF THE PROCESSING AND LEGAL BASES**

PURPOSE	LEGAL BASIS	RETENTION PERIOD
Establishment and performance of the contractual relationship between the users of the website <a href="http://www.af-systems.com">www.af-systems.com</a> and the Company.	Performance of the contract. Legitimate interest for the Data of the users of the website <a href="http://www.af-systems.com">www.af-systems.com</a> involved in the activities that form the subject of the contract.	<b>For the entire term of the contract [and for 10 years following its end]. In the case of litigation, for the entire duration thereof, until the expiry of the time limits allowed for the exercise of legal remedies.</b>
Fulfilment of obligations envisaged by regulations and by the applicable national and supranational regulatory framework.	Need to fulfil legal obligations.	<b>For the duration envisaged by the regulations and by the applicable national and supranational regulatory framework.</b>
Initiation of civil, criminal and/or administrative proceedings for the protection of AF Systems s.r.l.	Legitimate interest.	<b>For the entire duration of the litigation, until the expiry of the time limits allowed for the exercise of legal remedies.</b>
Out-of-court credit recovery	Legitimate interest.	<b>For the time required for the management of out-of-court credit recovery.</b>

Once the aforementioned retention times have elapsed, the Data will be destroyed, erased or anonymised, in accordance with the technical erasure and backup procedures.



## **5. MEANS OF PROCESSING**

The processing of Data shall be performed in accordance with the principles of fairness, lawfulness, transparency and minimisation of data (*privacy by design*); it may be performed manually and by automated means appropriate for saving, processing and transmitting them, and it will be performed with adequate organisational and technical measures, taking into account the state of the art and the implementation costs. AF Systems s.r.l. guarantees the safety, the confidentiality, the integrity, the availability and the resilience of the systems and services, preventing

the risk of unauthorised loss, destruction, access or divulgation, or, however, unlawful use, also through reasonable measures to promptly erase or correct inaccurate data in accordance with the purposes for which they are processed.

## **6. RIGHTS OF THE DATA SUBJECT (ARTICLES 15-22 of the GDPR)**

6.1 The data subjects shall have the rights of articles 15 to 22 of the GDPR, where applicable.

6.2 In particular, the data subjects may request from the Controller access to the Data, the rectification of inaccurate Data, the completion of incomplete Data, the erasure of the Data, as well as the restriction of processing in the cases laid down by art. 18 of the GDPR.

6.3 The data subjects shall have the right to object at any time, in whole or in part, to the processing of the Data that is required for the furtherance of the Controller's legitimate interest.

6.4. Furthermore, the data subjects, in the cases envisaged by art. 20 of the GDPR for the exercise of the right to portability, shall have the right to receive the Data provided to the Controller in a structured, commonly used and machine-readable format, and, if technically feasible, to transmit them to another controller without impediment.

6.5 The data subjects shall have the right to withdraw the consent granted at any time for marketing and/or profiling purposes, and to object to the processing of the data for marketing purposes, including profiling related to direct marketing. This without prejudice to the possibility for data subjects who prefer being contacted for the aforementioned purpose exclusively by traditional means to express their objection only to receiving communications by automated means.

6.6 The data subjects shall have the right to lodge a complaint with the competent Supervisory Authority (in particular in the member State where they usually reside or work or in the State where the presumed violation took place).

6.7 These rights may be exercised by registered letter or certified e-mail sent to the address of the Data Controller or of the Data Protection Officer, as identified under point 2.

## **7. PRIVACY MANAGEMENT MODEL**

7.1 The Company, in its capacity as Data Controller, has prepared a model for the protection of the personal data, identifying roles and responsibilities with regard to the protection of the data, identifying, in particular, the heads of the company's organisational units, exclusively for the processing operations under their purview, as responsible for the performance of the model in compliance with the applicable regulatory provisions ("**Privacy Contact Persons**").

7.2 The Data may be processed by the employees of the company's departments that have been tasked with the furtherance of the aforementioned purposes (hereinafter, "Authorised Employees"). Said Authorised Employees have been tasked with Processing and have received adequate operating instructions on the matter.



## **8. CATEGORIES OF RECIPIENTS TO WHOM THE DATA MAY BE DISCLOSED IN THEIR CAPACITY AS CONTROLLERS OR WHO MAY BECOME AWARE OF THE DATA IN THEIR CAPACITY AS PROCESSORS**

8.1 The Data may be disclosed to external subjects operating in the capacity of data controllers, including but not limited to vigilance and supervisory authorities and bodies, and, in general, public or private entities legitimised to request the Data.

8.2. The Data may be processed, on behalf of the Controller, by external subjects appointed as data processors, which perform, on behalf of the Controller, specific activities, including but not limited to accounting, tax-related and insurance obligations, dispatch of correspondence, management of collections and payment, etc.

## **9. TRANSFER OF THE DATA OUTSIDE THE EU**

9.1 The Data may be transferred abroad to countries outside the EU, and, in particular: Hypothesis 1) “whose level of data protection has been deemed adequate by the European Commission pursuant to art. 45 of the GDPR”

or

Hypothesis 2) “subject to the execution of the Standard Contractual Clauses adopted/approved by the European Commission pursuant to art. 46, 2, letters c) and d)”

or

Hypothesis 3) “subject to the adoption of the other guarantees of art. 46 and 47 of the GDPR”

or

Hypothesis 4) “subject to the presence of one of the derogations of art. 49 of the GDPR”