

PRIVACY NOTICE TO CUSTOMERS' CONTACT PERSONS

This Privacy notice describes how we process your personal data and explains your rights, pursuant to Regulation (EU) 2016/676 (GDPR).

1. Identity of the Controller

The Data Controller is Fairmat S.r.l. (hereinafter "the Controller") with head office in Verona, Piazza Bra 28 - 37121; contact email: privacy@fairmat.com.

2. Purpose of data processing

Your personal data is processed for the following purposes:

- [1] Acquire accepted orders and signed agreements;
- [2] Carry out transactions for managing payments;
- [3] Manage accounting, administration, financial flows and treasury;
- [4] Forward communications for order/contract management;
- [5] Prevent and manage possible litigation;
- [6] Manage and retain the electronic invoices issued;
- [7] Keeping track of users' access logs to its systems to detect any abnormal behavior through periodic audits and drafting related reports in order to ensure the security of its solutions;
- [8] Safely retain data (cloud storage);
- [9] inform customers about new solutions offered by Fairmat and/or regulatory updates that impact on management of solutions already adopted;
- [10] Generate access credentials for Fairmat solutions, if requested by the Customer.

3. Source of the data

Processed personal data is provided directly by Fairmat customers' contact persons.

4. Data categories

Processed personal data belongs to the following categories: personal and contact data, role played and company, which they belong to, credentials, IP addresses and access log to Fairmat solutions.

5. Lawful basis of processing

The personal data of our customers' contact persons is lawfully processed for:

- Execution of a contract of which the data subjects are a party or of pre-contractual measures taken at their request [purposes 1, 2, 3, 4,10];
- Legitimate interest of the Data Controller intended to:
 - guarantee the management of litigation [purpose 5];
 - keep track of access logs to ensure the security of your solutions [purpose 7];

- ensure the security of data stored in the cloud, guaranteeing the data subjects adequate personal data protection [purpose 8];
 - make your services and solutions known, also in relation to any regulatory updates, allowing data subjects to be promptly informed on possible evolutions of the solutions already adopted or on new useful services [purpose 9].
- Legal obligations of the Data Controller [purpose 6].

6. Processing and retention method

Processing of your data is handled with automatic and manual tools, in compliance with the principles and provisions of the GDPR, by specifically authorized and trained subjects.

7. Data recipients

The Data Controller shall not disseminate your personal data nor shall he disclose it to indeterminate subjects, in any possible way, including making it available or simply consulting it.

However, data may be communicated: to workers who work for the Controller and are therefore appropriately trained and authorized; to Data Processors appointed and contracted pursuant to art. 28 of the GDPR; to subjects responsible for conducting audits on internal company systems; to subjects entitled to access data pursuant to legal provisions, regulations and EU regulations.

8. Data transfer

Under no circumstances shall the Data Controller transfer personal data to third countries or to international organizations. The Controller could use cloud services, selecting suppliers capable of providing adequate guarantees, as required by art. 46 of the GDPR.

9. Data retention

The Data Controller retains and processes personal data for the time required to pursue the mentioned purposes. Specifically, data of customers' contact persons is retained:

- until the end of the ongoing contractual relationship and, thereafter, to the extent strictly necessary, until the end of the administrative limitation period [purpose 1; 2; 3; 4; 5, 10];
- for 10 years from the date of invoice issue, except for any ongoing investigations [purpose 6]
- 6 months for retaining logs of users who access Fairmat solutions [purpose 7]
- sending of communications (soft-spam) is suspended in case of opt-out [purpose 9].

10. Data provision

The data subject may refuse to provide the Controller with his personal data. However, since provision of personal data is required for the correct and efficient management of the contractual relationship, any refusal to provide data could impair, as a whole or in part, continuation of the relationship between the Parties; as well as the effectiveness of the service (use of Fairmat solutions).

11. Data subjects' rights

As a "data subject", viz. a natural person whose personal data is being processed, you can exercise your rights specified in the following articles of the GDPR:

15 – right to access to data,

16 – right to rectify,

17 – right to erasure (right to be forgotten),

18 – right to restrict processing,

20 – right to data portability,

21 – right to object,

22 – right to object to automated decision-making process

by writing to the Controller, at the above-mentioned address, specifying the subject of your request, the right you intend to exercise and sending the request to the Controller, to allow him to check your identity and ascertain the legitimacy of the request. The legitimate exercise of your rights does not entail any cost to you. The Controller guarantees a response within one month.

12. Lodging of a complaint

As a "data subject" you have the right to lodge a complaint with the Supervisory Authority of the State of residence.

13. Automated decision-making processes

Under no circumstances shall the Controller carry out processing of personal data that involves automated decision-making processes capable of producing legal effects or in any case significantly impacting on your person.

Date of last update: May 31st, 2024