CUSTOMER PRIVACY NOTICE

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

1. Identity of the Data Controller

The Data Controller is Fairmat S.r.l. (hereinafter 'the Data Controller') with registered office in Verona, Piazza Brà 28 - 37121; contact e-mail: privacy@fairmat.com.

2. Purpose of processing

Your personal data are processed for the following purposes:

[1] Acquire accepted orders and signed agreements;

[2] Carrying out operations for the handling of payments;

[3] Manage accounting, administration, cash flow and treasury;

[4] Forwarding communications for order/contract management;

[5] Preventing and managing possible litigation;

[6] Manage and store electronic invoices issued;

[7] Keeping track of users' access logs to its systems in order to detect any anomalous behaviour, through periodic checks and reporting, in order to ensure the security of its solutions;

[8] Secure data storage (cloud storage);

[9] Informing customers about new solutions offered by Fairmat and/or regulatory updates that impact on the management of solutions already adopted;

[10] Generate Fairmat solution access credentials, if requested by the customer;

[11] Being able to contact the respondent of the Customer Satisfaction survey questionnaire for any further information on the answers provided.

3. Data source

The personal data processed are provided directly by Fairmat's customer contacts.

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4. Data categories

The personal data processed belong to the following categories: personal and contact data, role played and company, credentials, IP addresses and access logs to Fairmat solutions.

5. Legal basis for processing

The personal data of our customer contacts are lawfully processed for:

- Performance of a contract to which the data subjects are party or of pre-contractual measures taken at their request [purposes 1, 2, 3, 4, 10];
- Legitimate interest of the data controller aimed at:
  - ensure the management of disputes [purpose 5];
  - keep track of access logs in order to ensure the security of their solutions [purpose 7];
  - ensure the security of data stored in the cloud, guaranteeing data subjects adequate protection of their personal data [purpose 8];
  - make its services and solutions known, also in relation to possible regulatory updates, enabling interested parties to be informed in a timely manner of possible developments in the solutions already adopted or of useful new services [purpose 9];
- Legal obligations incumbent on the Controller [purpose 6];
- Consent of the person completing the satisfaction questionnaire to the processing of his or her contact data [purpose 11].

6. Processing and storage methods

The processing of your data is carried out with automatic and manual tools, in compliance with the principles and requirements of the GDPR, by specially authorised and trained persons.

7. Data recipients

The Controller shall not disclose your personal data, i.e. it shall not make them known to unspecified persons, in any possible form, including making them available or simply consulting them.
On the other hand, they may be communicated to: workers employed by the Data Controller and duly trained and authorised for this purpose; the Data Processors appointed and contracted pursuant to Article 28 of the GDPR; persons appointed to conduct audits of the company's internal systems; and persons authorised to access them pursuant to provisions of law, regulations, and EU legislation.

8. Data Transfer

Under no circumstances does the data controller transfer personal data to third countries or international organisations.
The Controller may use cloud services, selecting suppliers that can provide adequate guarantees, as provided for in Article 46 of the GDPR.

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9. Data Retention

The Data Controller stores and processes personal data for the time necessary to pursue the stated purposes. Specifically, the data of customers' contact persons are stored:

- until the end of the contractual relationship initiated and thereafter, to the extent strictly necessary, until the end of the administrative limitation period [purposes 1; 2; 3; 4; 5, 10]
- for 10 years from the date of issue of the invoice, subject to any ongoing assessment [purpose 6];
- 6 months for the retention of logs of users accessing Fairmat solutions [purpose 7];
- the sending of communications (soft-spam) is suspended in case of opt-out [purpose 9];
- at the end of the analysis of the questionnaires (unless consent is revoked) [purpose 11].

10. Provision of data

The data subject may refuse to provide the Controller with personal data. However, the provision of personal data is necessary for the proper and efficient management of the contractual relationship. Therefore, any refusal to provide the data could compromise all or part of the continuation of the relationship between the Parties; as well as the effectiveness of the service (use of Fairmat's solutions).

The provision of contact data for the Customer Satisfaction survey is at the discretion of the Customer and any refusal will in no way compromise the effectiveness of the contractual relationship or the service.

11. Rights of the data subject

As a 'data subject', i.e. a natural person whose personal data are being processed, you may exercise your rights as set out in the following articles of the GDPR:
15 - right of access to data,
16 - right of rectification,
17 - right to erasure (right to be forgotten),
18 - right to restriction of processing,
20 - right to portability,
21 - right to object,
22 - right to object to automated decision-making,
by writing to the Controller, at the above address, specifying the subject of your request, the right you wish to exercise and sending the Controller what you have requested, to enable him to verify your identity and ascertain the legitimacy of your request. The legitimate exercise of your rights does not entail any cost for you. The Holder guarantees a reply within one month.

Withdrawal of consent
With reference to Article 7 of the GDPR, it is possible to revoke consent given for the purpose (11) at any time by sending an e-mail to .privacy@fairmat.com
From the date of revocation of consent, the data collected will be deleted from the company archives.
It should also be noted that revocation of consent does not affect the lawfulness of the use of personal data based on consent before revocation.

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12. Complaint

As a 'data subject' you have the right to lodge a complaint with the supervisory authority of your state of residence.

13. Automated decision-making processes

Under no circumstances does the Controller process personal data involving automated decision-making processes capable of producing legal effects or otherwise significantly affecting your person.

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