

**Information**  
**about the processing of personal data pursuant**  
**to arts. 12 et seq of Regulation (EU) 2016/679**

*Subject: information about the processing of personal data pursuant to arts. 12 et seq of Regulation (EU) 2016/679*

### **Introduction**

Regulation (EU) 2016/679 («General Data Protection Regulation»), hereinafter GDPR) provides safeguards for natural persons with regard to the processing of their personal data. In accordance with the above legislation, the processing of personal data that refers to an identified or identifiable natural person, being the “data subject”, is based on the principles of correctness, legality and transparency, as well as the protection of confidentiality and the rights of the data subject.

This information is provided in compliance with the above Regulation to inform you that, with regard to your customer relationship with our organization, we hold certain data about you that was acquired, verbally or in writing, either directly or via third parties that carry out operations concerning you or that, in response to your requests, acquire information and provide it to us.

Pursuant to the GDPR, this information must be treated as “personal data” since it relates to you and must therefore benefit from the protection provided by the above Regulation. More specifically, in accordance with the Regulation, you are the data subject who benefits from the rights that safeguard your personal data.

**Pursuant to arts. 12 et seq of the GDPR**, as the Controller, our organization will process the personal data provided by you with the utmost care in compliance with the Regulation, implementing effective operational procedures and processes in order to guarantee the safeguards that protect the processing of your personal data. For this purpose, using material and operational procedures to safeguard the collected data, we undertake to protect the information provided, in order to avoid unauthorized access and disclosure, maintain the accuracy of the data and guarantee its appropriate use.

Consistent with this introduction, the following information is provided:

### **Collected personal data**

Our organization, as the Controller, uses your personal data to carry on our business activities in the best possible manner.

You may be requested to provide some or all of the following data:

- personal identification details, tax code, VAT number, name, registered offices, residential address, domicile and contact data;
- data about the contractual relationship that describes the type of contract, as well as information regarding its execution that is needed in order to fulfill the contract;
- accounting data about the economic relationship, the amounts due and payments made, the related trend in payments and summary accounting status of the relationship;
- data that clarifies the relationship with our organization and makes our collaboration more operationally efficient and effective;
- data about: your employees and/or collaborators, your profession or your business.

### **Length of time that your data will be retained**

The collected data will be retained for the entire duration of the relationship or collaboration with our organization, and for 5 years after the end of the relationship. If during the contract period, data is processed that is not relevant to the administrative-accounting obligations arising under the contract, such data will be retained for the time necessary to achieve the purposes for which it was collected, and then deleted. You will be given specific information about the length of time that your data will be retained when the data is collected.

### **Mandatory or optional nature of providing data and consequences of refusal**

The essential data needed to execute the contract must be provided to us, together with the data required to fulfill legal, regulatory and EU legislation obligations, as well as instructions from competent authorities and supervisory and control bodies.

Non-essential data, not required for execution of the contractual relationship, must be identified and considered additional information whose provision, if requested, is optional. Your refusal to provide such data would however mean that our organization will be less efficient when dealing with third parties.

Should "data that is sensitive or whose processing is subject to specific risks" be needed in order to carry out the contract, provide specific services or fulfill legal obligations, the provision of such data will be mandatory and, since it can only be processed following written consent from the data subject, you will have to give consent for its processing.

### **Methods of processing**

Pursuant and consequent to arts. 12 et seq GDPR, the personal data that you provide will be recorded, processed and retained in our hard-copy and electronic files, in compliance with the adequate technical and organizational measures specified in art. 32 GDPR. The processing of your personal data may consist in any operation or series of operations described in art. 4, para. 1, point 2 GDPR. Personal data will be processed using suitable tools and procedures that guarantee security and confidentiality. Such processing may be carried out directly and/or via delegated third parties, both manually using hard-copy support and electronically using IT equipment and other instruments. In order to manage properly the relationship and fulfill legal obligations, personal data may be included in the internal documentation of the Controller and, if necessary, in the documents and registers required by law.

### **Activities which may be entrusted to external parties**

When carrying out our activities as the Data Controller, we may occasionally request other operators to perform certain services on our behalf, such as processing or other services; services needed in order to carry out requested operations or activities; shipments and deliveries; accounting registrations; administrative activities. If the operator appointed by the Controller to carry out certain activities is a company that provides payment, tax collection and treasury management, banking and financial brokerage services, the following services may also be supplied: mass processing of payments, notes, checks and other securities; sending, placing in envelopes, transportation and sorting of communications; filing of documents; identification of financial risks; control of fraud; credit collection. The above operators will only be given the information needed to provide the requested services. They will be required to maintain confidentiality and forbidden to use the data provided for purposes other than those agreed. Operators that are not persons in our organization tasked with processing personal data will be appointed as Data Processors (pursuant to art. 28 GDPR) and will process the data to the extent strictly necessary in order to provide the requested service and solely for that purpose, guaranteeing that their persons tasked with processing have signed a confidentiality agreement. For any matters not indicated herein, these operators must provide specific information about the processing of personal data carried out by them.

### **Transfer abroad of personal data**

The data provided by you will only be processed in Italy. If during the contractual relationship your data is processed in a non-EU State, your rights under EU legislation will be guaranteed and you will be informed on a timely basis.

### **Purposes of processing your personal data**

The main purpose for which our organization will process your personal data is to enable the relationship described in the introduction to become established and/or develop, as well as to ensure that it is administered correctly.

In particular, the following purposes of processing are identified:

- Administrative-accounting purposes and, in particular:
- Fulfillment of tax or accounting obligations;
- Management of customers (customer administration; contract administration, orders, shipping and invoicing; checks on reliability and solvency);
- Management of disputes (contractual breaches; warnings; settlements; credit collection; arbitration; judicial disputes);
- Internal controls (security, productivity, quality of services, safeguarding of assets);
- Management of sales and marketing activities (market analyses and surveys); - Promotional activities;
- Customer satisfaction surveys;

Personal data will be processed to fulfill legal obligations, as well as the administrative, insurance and tax obligations envisaged under current legislation, to satisfy accounting and commercial needs, and to fulfill in a timely manner the contractual and legal obligations deriving from the contractual relationship with the data subject. The data provided may also be used to contact the data subject in the context of market research relating to the products or services, or in the context of commercial campaigns or offers. The data subject is free, in all cases, to refuse consent for such purposes and also to specify the manner in which to be contacted or to receive commercial information.

#### **Extent of knowledge of your data**

The following categories of data processors or persons tasked with processing by our organization may become aware of your data:

- Employees or collaborators in general working in registration and internal administration offices;
- Persons appointed to record and provide services, as well as maintenance and support for the services supplied to you;
- Accounting and invoicing personnel;
- Service sales personnel;
- Customer satisfaction survey personnel; fraud and cheating prevention personnel;
- Marketing office personnel;
- Offices, services and secondary branches;
- External envelope stuffing personnel;
- Consultants appointed to provide our organization with advisory, support and other services; - Executives and directors;
- Members of control bodies;
- Our agents, representatives and distributors;
- Personal data may also become known by parties that have agreements with us, as indicated in the section entitled "Methods of processing". We may delegate the fulfillment of certain obligations or deeds to such parties, for the purpose of executing the contractual relationship with the data subject.

#### **Communication and dissemination**

Our organization may communicate your data externally, i.e. make it known to one or more specific parties, in order to fulfill all required legal and/or contractual obligations. In particular, your data may be communicated to:

- a) other Zucchetti Group companies, including parent companies, subsidiaries and associates;
- b) public offices or bodies or supervisory bodies, in accordance with legal and/or contractual obligations;
- c) banks and/or financial institutions for management of the payments deriving from the contractual relationship;

We may communicate your data:

- to parties able to access it pursuant to laws, regulations or EU legislation, within the limits envisaged in those rules;
- to parties that need to access your data for purposes ancillary to the relationship that exists between you and us, within the limits strictly necessary to carry out the ancillary tasks (for example, but not limited to, banks and carriers);
- to our consultants and/or professionals, within the limits required for them to carry out their work at our or their organization, following their appointment by us as a data processor with duties of confidentiality and security.

In all cases, your data will only be communicated to operators in order to contribute to fulfillment of the contractual relations that may arise with the data subjects concerned.

*Dissemination* - We will not disseminate your data indiscriminately, i.e. we will not make it known to unspecified subjects, or make it available for use or consultation.

*Trust and confidentiality* - We recognize the importance of the trust shown by data subjects who consent to the processing of their personal data and, therefore, we undertake not to sell, hire or rent such personal information to others.

Rights pursuant to arts. 15 et seq GDPR - Pursuant to art. 15 GDPR, you are entitled to obtain confirmation of whether or not your personal data has been processed, even if the results have not yet been recorded. Exercise of this right depends on verification of the identity of the data subject, by presentation of an identity document that will not be retained by our organization, but merely checked to verify the legitimacy of the request.

You are entitled to access to your personal data and the following information:

- a) the purposes of processing;
- b) the categories of personal data that are processed;
- c) the recipients or categories of recipient to which the personal data has been or will be communicated, especially if they are resident in another country or are international organizations;
- d) when possible, the expected period of time that the personal data will be retained or, if not possible, the criteria used to determine that period;
- e) if the data was not collected from the data subject, all the information available about its origin;
- f) the existence of an automated decision process, including the profiling referred to in art. 22, paras. 1 and 4, and, at least in such cases, meaningful information about the logic used, as well as the importance of such processing and its consequences for the data subject.

If the data is transferred to another country or to an international organization, you are entitled to be informed about the existence of adequate guarantees pursuant to art. 46 GDPR.

You are entitled to request the controller to amend or delete your personal data, in whole or in part, or to restrict the processing of your personal data or to object, in whole or in part, to its processing.

To exercise these rights, contact the "Data Controller" for our organization at [privacy@verticalbooking.com](mailto:privacy@verticalbooking.com) or call +39 035 232366 or write to Vertical Booking Srl, c/o Privacy Office, Piazza Pontida 7 – 24122 Bergamo / Italy. The Controller will respond within 30 days of receiving your formal request.

If your rights concerning your personal data are infringed, you may complain to the competent authority:

"Garantor for the protection of personal data - Garante".

Identification details of the Data Controller and, if appointed, the Representative in the territory of the State and the Data Processor.

**Controller** - This organization is the Controller of processing: VERTICAL BOOKING SRL, with registered offices at Piazza Pontida 7 – 24122 Bergamo / Italy ; Tel: +39 035 232366; certified e-mail address: [a.e.c.srl@legalmail.it](mailto:a.e.c.srl@legalmail.it) ; e-mail: [privacy@verticalbooking.com](mailto:privacy@verticalbooking.com) .

**Data Protection Officer** - The Data Protection Officer is Mario Brocca, who can be contacted at +39 0371/5943191 - [dpogruppozucchetti@gruppozucchetti.it](mailto:dpogruppozucchetti@gruppozucchetti.it)

**Data Processors** - The Data Processors are external firms with which contractual relations have been established, and which need your personal data in order to fulfill those agreements.

Each data subject may send a letter to the Data Controller, at the above address, requesting information about any Data Processors that have been appointed and to be informed about any persons appointed to perform that function in future.

Please note that the above Data Processors are not responsible for fulfilling requests from data subjects to exercise their rights pursuant to arts. 15 et seq GDPR. That activity is carried out exclusively by this organization as the Data Controller.

Representative in the territory of the State - Pursuant to art. 4, para. 1, point 17 GDPR, it is confirmed that none of the related circumstances envisaged in the Regulation are applicable and that, accordingly, our organization has not appointed any Representatives in the territory of the State for the purpose of applying the regulations that govern the processing of personal data.

Processing without need for consent from the data subject - Even without your consent, this organization is entitled to process your personal data should it be necessary in order to:

- fulfill an obligation required by law, by a regulation or by EU legislation;

- fulfill obligations deriving from a contract to which you are a party or to fulfill specific requests received from you prior to termination of the contract.

Furthermore, your express consent is not required when the processing:

- 1) concerns data obtained from public registers, lists, deeds or documents that can be read by anyone, without prejudice to the limits and procedures that laws, regulations or EU legislation establish with regard to obtaining knowledge about and the publishing of data, or to data on the performance of economic activities, processed in compliance with current regulations governing business and industrial secrets;
- 2) is necessary in order to safeguard the life or physical safety of a third party (in this case, the Controller must inform the data subject about the processing of that personal data, even subsequent, but as soon as possible. In such circumstances, therefore, consent is given following presentation of that information);
- 3) is necessary, with the exclusion of dissemination, in order to carry out defense investigations pursuant to Law 397 dated December 7, 2000 or, in any case, to uphold or defend a right in court, on condition that the data is processed solely for those purposes and for the period strictly necessary for their pursuit, in compliance with current regulations governing business and industrial secrets;
- 4) is necessary, with the exclusion of dissemination, in cases identified by the Garante on the basis of legal principles, in pursuit of the legitimate interests of the Controller or another recipient of the data, including with reference to the activities of banking groups and subsidiaries or associates, should the fundamental rights and liberties, dignity or legitimate interests of the data subject not prevail.

THE CONTROLLER  
of the processing of personal data

Vertical Booking Srl