	INFORMATION CONCERNING THE PROCESSING OF THE CLIENTS' PERSONAL DATA	PRINFINF_D.00
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UPDATES					
REV.	DATE	CONTENT	PREPARED BY	APPROVED BY	AUTHORISED BY
00	22/06/18	First release	V. Rovazzani	A. Gambusera	A. Gambusera

To the Clients of Hydronit Srl, Via Pastrengo 62, Varedo (MB), Italy

This information is provided in accordance with the Italian Legislative Decree 196/2003 and Articles 13 and 14 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (referred to as the GDPR 2016/679).

Controller and processors - Art. 13 and 14.1.a-b of the GDPR 2016/679

The controller is:

Hydronit Srl, Via Pastrengo, 62, 20814 Varedo (MB), Italy, tel. (+39) 03621841210, email privacy@hydronit.com, to be contacted as regards the exercise of the rights under the GDPR and in order to receive an updated list of all the processors.

1. Categories of the processed data

Direct sales

In the course of our business relationship with you, we collect your **full name** and **contact details** (such as **phone number**, **e-mail address** and **correspondence address**) of your representative(s), necessary to contact you.

E-commerce – Art. 14.1.d of the GDPR 2016/679


In case of our Clients using the online sales platform, the following data will be required at the registration: **full name**, **e-mail address**, **phone number** and **Tax Id. No.** or **VAT Id. No.**

2. Source of the processed data for the e-commerce procedure – Art 14.2.f of the GDPR 2016/679

The aforementioned data will be collected during the registration on an e-commerce dedicated website. Therefore, the data are provided directly by a data subject, and they do not come from publicly available sources.

3. Purposes of, and legal basis for, the processing - Art. 13 and 14.1.c of the GDPR 2016/679

The personal data are processed as part of Hydronit Srl's standard business activities for the following purposes:

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1. purposes strictly connected with, and instrumental for, the management of relationships with the Clients
2. purposes strictly deriving from obligations prescribed by law, regulations, Community legislation and instructions issued by any competent authorities or supervisory bodies
3. purposes involving the protection of legitimate interests of Hydronit Srl through legal action or otherwise, in conformity with rules prescribed by law.

We will archive your personal data in our IT archives, with the option of archiving paper documents only when appropriate.

4. Transmission and transferring of the data - Art. 13 and 14.1.e-f of the GDPR 2016/679

All the information indicated above may be transferred, without necessity to obtain any further consent, to third-party companies and consultants involved in the performance of any related business obligations, in line with any applicable regulations, such as, for instance, legal offices, accounting firms, notaries, technical consultants etc.

No further processing based on legitimate interests of the controller is expected.

5. Keeping under control, archiving the data, and period for which the personal data will be stored - Art. 13 and 14.2.a of the GDPR 2016/679


The files concerning our Clients are managed via our IT system which guarantees limited access restricted exclusively to those working within the Company in the Administration or Quality departments that are obliged to have access to the information for legitimate reasons related to the nature of their assignments.

The paper documentation, wherever exists, is archived in cabinets kept in the offices and as such is available only to the staff of Hydronit Srl.

The database of Hydronit is equipped with security systems which guarantee protection both against unauthorised access and against other external factors that could be detrimental to the personal data. The access requests as regards the data are regulated, and the access is granted only to those who pursue authorised and lawful objectives related to the processing.

Reaffirming the guarantee that the access to the personal information is limited to Hydronit Srl's employees or other individuals who work for the Company, on a 'need to process' basis, we declare that all the staff of Hydronit Srl with access to the personal information have been provided with appropriate relevant training.

The period for which we will keep your personal information will depend on the duration of our business relationship.

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However, the period for which the personal data will be stored may be longer than the period of the contractual relationship due to legal obligations or necessity to manage any potential claims or irregularities that may come to light also subsequent to the end of the relationship.

6. Rights of the data subject - Art. 13.2.b-d of the GDPR 2016/679 and Art. 14.2.c-e of the GDPR 2016/679

The data subject has the right of access to the personal data and their rectification. For legitimate reasons, the data subject has the right to request erasure of their personal data or restriction of their processing; further, the data subject has the right to object to the processing of their personal data. As regards the exercise of their rights, the data subject shall contact the controller.

Moreover, the data subject may always contact the supervisory authority for the protection of the personal data.

7. Manner in which the personal data are provided, and consequences of potential refusal to provide them

The personal data are provided on a voluntary basis but without them it will not be possible to enter into a contractual relationship.

Therefore, whenever the Client refuses to provide the information indicated above, we will not be able to supply the requested products.

1. Other indications - Art. 13.2.f of the GDPR 2016/679 and Art. 14.2.g of the GDPR 2016/679

With regard to the data, there is no automated decision-making or profiling in place.

The controller does not intend to distribute the data or transfer them to any third parties for purposes other than the ones expressly indicated herein.

With the signature below, you confirm having read and understood the information above.

Name and surname _____

Signature _____