



Customer and Supplier Policy for the processing of personal data pursuant to Legislative Decree 196/2003 as amended by Legislative Decree 101/2018, and of art. 13 of the General Regulation on Data Protection (EU) 2016/679

Axial Fans Int Srl, with registered office in Via Leonardo da Vinci SNC - 21010 Besnate (VA), Fiscal Code and VAT number 02301740037 (hereinafter "**Owner**"), as Data Controller, pursuant to Legislative Decree 196/03 (hereinafter, "**Privacy Code**") as amended by Legislative Decree 101/2018 and art. 13 General Regulation on Data Protection EU 679/2016 (hereinafter "**GDPR**") informs you that your data will be processed in the following manner and for the following purposes:

1. Object of data processing

The Owner processes personal identification data (such as name, surname, company name, address, phone number, email address, bank account details and payment information), hereinafter "personal data" o "data", communicated by you in case of pre-contractual activities or conclusion of the contracts for supply of goods and/or of the Owner.

2. Purpose of data processing

Your personal data are processed without your express consent (Article 24 letter a), b), c) Privacy Code and art. 6 lett. b), e) GDPR), for the following purposes:

- Contractual purposes.
Conclude contracts for the supply of goods and / or services of the Owner; fulfill the pre-contractual, contractual and tax obligations arising from existing relationship with you.
- Administrative and accounting purposes.
For the purposes of applying the provisions concerning the protection of personal data, the processing of personal data carried out for administrative-accounting purposes is that related to the performance of organizational, administrative, financial and accounting activities, regardless of the nature of the data processed. In particular these purposes are pursued in case of internal organizational activities, functional activities of the fulfillment of contractual and pre-contractual obligations, management of the employment relationship in all its phases, keeping the accounts and applying the rules on tax, trade union, social security, health, hygiene and safety at work.
- Informational and promotional purposes.
The use of e-mail address provided by the customer in case of direct sale of a product or service is permitted for the purpose of sending promotional information and newsletters. At the time of data collection and every time the communication is sent the interested party is informed of the possibility of opposing data processing easily and free of charge (Article 130 paragraph 4 of Legislative Decree 196 / 03)
In order to unsubscribe from the mailing list it is sufficient to send an email to info@axialfansint.com or send a letter by regular mail to the address of the Owner indicated above (location) with the subject "cancellation mailing list".
- Safety purposes, pursuant to Legislative Decree. 81/2008.
With particular reference to personal identification, data given by the guest / visitor of our offices (name, surname, institution or company name) data processing has the exclusive purpose of ensuring compliance with the formally applied company safety procedures also on the basis of current regulatory provisions (eg. data entry in the visitors' register / database, temporary identification badge assignment, application of legal obligations concerning health and safety)
- Exercise the rights of the Owner and the right of defense in court.

3. Methods of data processing

The processing of your personal data is carried out by means of the operations indicated in art. 4 of the Privacy Code and art. 4 n. 2) GDPR and precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destroying of data. Your personal data is subject to both paper and electronic and / or automated processing.

The Owner will process the personal data for the time necessary to fulfill the aforementioned purposes and in any case for no more than 10 years from the termination of the contract and for no more than 5 years from the collection of data for the information and promotional purposes.

4. Access to data

For the purposes of the par.2 of this document, your data may be available to:

- Employees and staff authorized by the Owner;
- Data processors and system administrators designated by the Owner;

axial fans int srl - info@axialfansint.com

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Capitale Sociale Euro 100.000,00 i.v. - C.F. e nr. iscrizione al Registro Imprese di Varese 02301740037 - P.IVA 02301740037
R.E.A. VA - 337449 - P.E.C. axialfansint srl@legalmail.it



- Third-parties or other entities (indicatively: credit institutions, professional firms, consultants, insurance, suppliers of third party technical services, mail carriers, hosting providers, IT companies, communication agencies, etc.) who carry out outsourced activities on behalf of the Owner, if necessary appointed as responsible for data processing;
- Entities that provide services for the management of the information system used by the Owner and the telecommunications networks who take care of the maintenance of the technological part (including e-mail and the newsletter service);
- Freelancers, firms or companies providing assistance and consultation;
- Entities that perform control, revision and certification of the activities carried out by the Owner;
- Authorities competent for the fulfillment of law obligations and / or provisions of public authorities requested by themselves

Your data may also be processed by professionals and/or companies in charge of carrying out technical, development, management and administrative-accounting activities on behalf of the Owner.

5. Data Transfer

The Owner processes personal data by adopting appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of personal data. Data processing is carried out using IT and / or telematic tools using organizational methods and logic strictly related to the purposes indicated above.

Personal data is processed at the registered office of Axial Fans Int S.r.l. and using servers, which are made available by third-party providers and that are located in European Union; for more information contact the Owner. Anyway, it is understood that the Owner, if necessary, will have the right to move the servers outside of European Union. In this case, the Owner ensures that the transfer of non-EU data will take place in accordance with the applicable legal provisions, subject to the stipulation of contracts and according to procedures set out in Chapter V of the GDPR.

6. Nature of data provision and consequences of refusal to reply

We are obliged to acquire certain personal data in order to fulfill the obligations arising from existing contracts and law obligations, regulations, community legislation or provisions issued by the legitimated by law authorities and by supervisory and control entities. Refusal to provide the data may make it impossible to establish or continue the relationship to the extent depending on data required for the execution of the relationship.

The provision of data to the Owner for commercial communications is optional; the interested party can oppose data processing at any time easily and free of charge. In order to unsubscribe from the mailing list it is sufficient to send an email to info@axialfansint.com or send a letter by regular mail to the address of the Owner indicated above (location) with the subject "cancellation mailing list".

7. Rights of the interested party

The interested party has the rights set by articles 15-21 of GDPR and precisely to: obtain confirmation of data existence, get to know its content and origin, verify its accuracy, request its integration, updating, correction, deletion, limitation of processing, portability, and to oppose, for legitimate reasons, to their treatment.

Whenever applicable the interested party has also the right to be forgotten, as well as the right to complain to the Antitrust Authority

8. The ways of exercising rights

You can exercise your rights at any time by sending:

- a registered letter to the attention of Axial Fans Int S.r.l., in Via Leonardo da Vinci SNC, 21010 Besnate (VA);
- an email to the following address: info@axialfansint.com

The updated list of those responsible of data processing is kept at the registered office of the Owner.

Besnate, 08-12-2018

axial fans int srl - info@axialfansint.com

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