



Sirion s.r.l.

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P.IVA e C.F. 01731880058

C.C.I.A.A. - REA N° 310006

Cap. Sociale: € 1.250.000 i.v.

PRIVACY DISCLOSURE PURSUANT TO ART. 13 OF D.LGS 30 JUNE 2003, N.196

AND OF THE ART. 13 OF EU REGULATION 2016/679

SIRION s.r.l., VAT 01731880058, with registered office in Asti (AT), Strada Cascina Cauda n.5, (hereinafter, "**Owner**"), as data controller, informs you pursuant to art. 13 D.Lgs. 30.06.2003 n. 196 (hereinafter "**Privacy Code**") and art. 13 EU Regulation n. 2016/679 (hereinafter, "**GDPR**") that your data will be processed in the manner and for the following purposes:

1- Object of data processing

- The Owner uses the personal datas, identifying and non-sensitive, ((by way of example but not limited to, name, surname, address, telephone, e-mail - hereinafter, "personal data" or even "data") communicated by you when signing the contract / subscription / package .
- The Owner also processes your sensitive personal data relating to health conditions.

2- Purpose of the treatment

Your personal data are processed:

A) without your express consent (Article 24 letter a), b), c) Privacy Code and art. 6 lett. b), e) GDPR), for the following Service Purposes:

- allow you to access, through your name, the services requested by you;
- participate in initiatives organized by the Owner (for example events);
- fulfill the obligations established by law, by a regulation, by community legislation or by an order of the Authority;
- exercise the rights of the owner, for example the right to exercise a right in court.

B) With this specific and distinct consent (articles 23 and 130 of the Privacy Code and article 7 of the GDPR), for the following Other Purposes:

- send e-mail surveys of opinion and approval, newsletters and / or invitations to events or subscribe to events of which it is part or that organizes the owner.

3- Method of treatment

The processing of your personal data is carried out through of the operations indicated in art.. 4 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 destruction of data.

- Your personal data are subjected to both paper and electronic and / or automated processing, by filing on a fixed server with the option of making a backup on an external disk.

- The Data Controller 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 Service Finality relationship and for no more than 2 years from the collection of data for Other Purposes.

4-Safety

The Owner has taken a variety of security measures to protect your data against the risk of loss, misuse or alteration. In particular, in order to ensure on a permanent basis the confidentiality, integrity, availability and resilience of the processing systems and services:

- has adopted the measures referred to in Articles 32-34 of the Privacy Code and to art. 32 GDPR, including the use of encryption and password;

- uses the Firewall technology to prevent unauthorized access, every day the server is backed up, and a further back-up is performed on an external disk that is stored in a place equipped with security systems such as locked doors, anti-intrusion alarm system.

The archive is located in a place equipped with security systems such as locked doors and antrintrusion alarm system.

5- Access to datas

Your data may be made accessible for the purposes referred to in art. 2.A) and 2.B):

- to employees and collaborators of the Owner, in their capacity as people in charge and / or internal managers of the processing and / or system administrators;

- to third-party companies or other subjects (by way of example, web site providers, cloud providers, suppliers, hardware and software service engineers, shippers and carriers, credit institutes, professional offices, etc.) who carry out outsourcing activities account of the Owner, in their capacity as data controllers.

6- Data communication

- Without your express consent (pursuant to Article 24 letter a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), the Owner may communicate your data for the purposes referred to in art. 2.A) to Supervisory Bodies, Judicial Authorities and to all the other subjects to whom the communication is mandatory by law for the accomplishment of said purposes.

- Otherwise your data will not be disseminated.

7- Data transfer

The management and storage of personal data will take place in Europe, on servers located in Italy of the Data Controller and / or third-party companies appointed and duly appointed as Data Processors.

8- Nature of providing data and consequences of refusing to answer

The provision of data for the purposes referred to in art. 2.A) is mandatory. In their absence, we can not guarantee you neither the registration nor the services of the art. 2.A). The provision of data for the purposes referred to in art. 2.B) is optional. You can then decide to deny the possibility of processing data already provided: in this case, you can not receive e-mail invitations to events, newsletters and opinion polls and approval. In any case you will continue to be entitled to the Services referred to in art. 2.A).

9- Rights of the interested party

- I. As interested parties, you have the rights set forth in art. 7 of the Privacy Code and art. 15 GDPR and precisely the rights of:
 - a) obtain confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;
- II. Get the indication:
 - a) of the origin of personal data;
 - b) of the purposes and methods of the processing;
 - c) of the logic applied in case of treatment carried out with the aid of electronic instruments;
 - d) of the identification details of the owner, the managers and the designated representative pursuant to art. 5, paragraph 2 of the Privacy Code and art. 3, paragraph 1, GDPR;
 - e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as designated representative in the territory of the State, managers or agents;
- III. Get:
 - a) the updating, rectification or, if you are interested, the integration of data;
 - b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
 - c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case where such fulfillment is it proves impossible or involves a use of means manifestly disproportionate to the protected right;
- IV. To object, in whole or in part:
 - a) for legitimate reasons, the processing of personal data concerning you, even if pertinent to the purpose of the collection;
 - b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and / or through traditional marketing methods by telephone and / or paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the data subject to exercise the right to object even only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or none of the two types of communication.

Where applicable, you also have the rights referred to in Articles 16-21 GDPR (Right of rectification, right to be forgotten, right of limitation of treatment, right to data portability, right of opposition), as well as the right of complaint to the Guarantor Authority.

10- How to exercise rights

You can exercise your rights at any time by sending:

- a registered letter with return receipt addressed to SIRION s.r.l., VAT 01731880058, with registered office in Asti (AT), Strada Cascina Cauda n.5;
- a pec at sirionasti@legalmail.it

11- Minors of 18 years

The Owner's Services are NOT intended for minors. In the case in which the minor has not completed the sixteenth year of age, the data will be treated, according to what foreseen by the art. 8 of the GDPR, only with the express consent of the subject holder of parental responsibility.

12- Owner, manager and agents

The Data Controller is SIRION s.r.l., VAT 01731880058, with registered office in Asti (AT), Strada Cascina Cauda n.5, and by the data processors indicated by it.



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The updated list of data processors and data processors is kept at the Data Controller's headquarters.

CONSENSUS PERFORMANCE

I undersigned interested Mr./Ms., pursuant to art. 4 of the GDPR (EU Regulation No. 2016/679 which defines the consensus as: "any manifestation of free will, specific, informed and unequivocal of the interested party with which he expresses his assent by declaration or unequivocal positive action that the data personal data concerning him / her being processed"), declaring to have previously received a copy of the privacy statement of SIRION srl, to have read it, understood and to be aware of having the possibility to accept or refuse consent for each single purpose of treatment without receiving constraints and constraints and without having negative consequences in case of refusal to provide data, knowing that consent is a necessary condition for carrying out the activities indicated below and that consent can be revoked at any time with ease, without impediments, and using the same channels used to provide it

I PRESENT MY CONSENT

to the processing activities carried out for the following purposes:

- allow me to access, through my name, the Services requested by me;
- participate in initiatives organized by the Owner (for example events);
- process the contact request (s);
- fulfill the obligations established by law, by a regulation, by community legislation or by an order of the Authority;
- exercise the rights of the Owner, such as the right to exercise a right in court;

Place and date

Signature

- receive e-mail surveys of opinion and approval, newsletters and / or invitations and / or registration to events;

- retain and keep, even after the termination of the relationship, the data I have given, without exception, in order to send me communications of your commercial initiatives (promotions, discounts, events, etc.).

Place and date

Signature