

CLIENT & SUPPLIER POLICY

With this privacy statement TODO SRL, in capacity as Data Controller and in accordance with and to the effects of the EU Regulation 2016/679 hereafter referred to as GDPR, informs you that the mentioned regulation provides for the protection of the interested parties as to the processing of personal data and that such processing will be based upon principles of fairness, lawfulness, transparency and protection of your privacy and rights.

Your personal data will be processed in accordance with the legal provisions of the above mentioned regulation and the obligation of confidentiality herein provided for.

Data processing purposes: in particular your data will be processed for the purposes below, related to the fulfillment of duties relevant to law or contract obligations:

- Management of the implemented orders and contracts
- Mandatory obligations by law in the fiscal and accounting fields.

The processing of functional data for the fulfillment of these obligations is necessary for a correct management of the relationship, and its conferment is mandatory to carry out the above mentioned purposes. The Data Controller also informs the user that failure to communicate or incorrect communication of any piece of mandatory information may make it impossible for the Data Controller to guarantee the correctness of the processing itself.

Methods of processing: your personal data can be processed in the following ways:

- Processing via IT means;
- Manual processing through hardcopy archives.

Each of these processing methods is carried out in accordance with methods as per articles 6, 32 of the GDPR and through the adoption of the appropriate security measures.

Communication: your data can be communicated exclusively to public bodies and offices to which fiscal data has to be communicated (Income Revenue Authority, Town Councils, Regional authorities, Province authorities, Chamber of Commerce, I.n.p.s.,

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I.N.A.I.L. and the like); and, if necessary for the execution of the requested services, to competent and duly appointed subjects for the fulfillment of the services necessary for a correct management of the relationship and to guarantee the protection of the rights of the interested party.

Your data will be processed only by personnel authorized by the Data Controller.

Disclosure: Your data will not be disclosed in any way.

Time of storage: we inform you that, complying with principles of fairness, limitation of purposes and minimization of data, in accordance with article 5 of the GDPR, the storage period of your personal data is:

- 10 years in compliance with obligations relevant to the storage of accounting books and records (art. 2220 of the civil code, which provides for a 10-year storage of accounting books and records; art. 22 del D.P.R. 29 September 1973, n.600)
- 10 years from the date of the contract closure (art. 2947 of the civil code, which provides for a 10-year prescription).

Data Controller: the Data Controller, in accordance with the applicable law, is TODO SRL based in Torino, Corso Galileo Ferraris 14, CAP 10121.

You have the right to obtain from the Data Controller the cancellation (right to be forgotten), limitation, update, correction, portability and opposition to the processing of personal data concerning you, and in general you can exercise all the rights provided for by articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

Reg.to UE 2016/679: Artt. 15, 16, 17, 18, 19, 20, 21, 22 – Rights of the Interested Party

1. The interested party has the right to obtain the confirmation of the existence or not of personal data that concerns them, even if not registered yet, and its communication in an intelligible form.

2. The interested party has the right to obtain information as to the:

- a. Origin of personal data;
- b. Purposes and methods of processing;

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c. Logic applied in case processing is carried out with the help of electronic means;

d. Personal data of the Data Controller, appointed personnel or representative in accordance with article 5, section comma 2;

e. Subjects or categories of subjects to which personal data can be communicated or to whom it can be disclosed in capacity as designated representative within the country, of the subjects in charge or appointed.

3. The interested party has the right to obtain:

a. The updating, rectification and, when interested, integration of data;

b. The cancellation, anonymous transformation or interruption of data processed in violation of the applicable law, comprising that of which storage is not necessary in relation to the purposes for which data has been collected or processed at a later time;

c. The declaration that the operations described in items a) and b) have been brought to the attention of, also in content, those to whom data has been communicated or disclosed, except in the case that such fulfillment is impossible to carry out or entails the use of means manifestly disproportionate compared to the protected right;

d. Data portability.

4. The interested parties have the right to oppose, completely or partly:

a. for reasons legitimate to data processing that concern the interested parties, even though pertinent to the purpose of the collection;

b. personal data processing that concerns them for the purpose of sending material regarding advertising, direct sales or research, market or commercial communication.

5. The interested parties have the right to lodge a complaint with a supervising authority;

6. The interested parties have the right to withdraw consent.

If you deem to exercise the above listed rights, you can write at the address: Corso Galileo Ferraris 14, CAP 10121, Turin, or to the following email amministrazione@todo.to.it.