

DISCLOSURE AND REQUEST OF CONSENT FOR THE PROCESSING OF PERSONAL DATA

1 - PREMISE

With the **Legislative Decree 196/2003** and the **EU Regulation 679/2016**, for the protection of individuals with regard for the processing of personal data, Insul.Tecno Group s.r.l. (hereinafter referred to as “**Insul.Tecno**”) P.Iva/C.F. 07164510963 with registered office in via Tantardini, n. 15 – 20136 Milano and operational headquarters in Via Marconi, n. 35 a/b – 20082 Binasco (MI), is required to provide information regarding the use of personal data. The **Data Controller** is Insul.Tecno Group s.r.l., in the person of its legal representative pro-tempore, Mr. Giorgio Cavallaro (e-mail: giorgio.cavallaro@insultecno.com). The **person in charge for the treatment** is Ms. **Giovanna Fiumara** (e-mail g.fiumara@insultecno.com). **Tel.** 02 9052899; **Fax** 02 90090251; **PEC** insul.tecnogroupsrl@legalmail.it
The updated list of **persons in charge of processing** can be found at the registered office.

2.- DATA SOURCE AND TYPE OF DATA PROCESSED



Personal data are given **directly** by the interested party when completing the form on the website <http://www.insultecno.com/>.

In any case, all the data are processed for institutional purposes according to the law and obligations of confidentiality, which has always inspired the activity done by Insul.Tecno.

3 - PERIOD OF DATA CONSERVATION



Data processing is achieved with the operations indicated in the art. 4 n. 2, of the EU Regulation 679/2016 (Definitions) and more specifically: collection, registration, organization, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.

Data are retained only for the period strictly necessary for the purposes for which they are processed and in accordance with the law, rules and national and Community regulations to whom Insul.Tecno must comply (e.g. Accounting and tax regulations, etc.).

In any case, data are retained for no more than 4 months from the completion of the form.

Periodic checks are planned on the data processed and with the possibility of data being deleted if they're no longer necessary for the intended purposes.

4 – DATA CONFERENCE AND CONSEQUENCES OF FAILURE TO CONFERMENT



The consent is **not mandatory** and, when given, can be revoked at any time by the interested party.

5 – DATA PROCESSING PURPOSES



Data are processed within the normal activity of Insul.Tecno and for the following, listed below. If Insul.Tecno intends further to process personal data other than that for which were collected for, it will provide the interested party with all the necessary informations.

The provided data provided are processed: with the **specific subject and informed consent** (art. 7, EU Regulation 679/2016 – *Conditions for consent*), for the following **Marketing Purposes**:

- Sending via e-mail, mail and/or text messages commercial communications and/or advertising material on products or services offered by Insul.Tecno and detection of the degree of satisfaction on the quality of services;
- Sending via e-mail, mail and/or text messages and/or telephone contacts newsletters, commercial and/or promotional communications of third parties (for example, business partners, insurance companies, other Group companies).

If you are already our customer, we can send you commercial communications related to our products similar to those you already purchased from us, with the exception of your right of opposition (art. 21, co. 2 e 3, EU Regulation 679/2016 – *Right of opposition*).

Data might be subject to an anonymous treatment for statistical activities aimed to improve the offered services through institutional activities.

6 – DATA PROCESSING METHOD



The processing of personal data shall be effected by manual, computerized and telematic tools with a logic strictly related to these purposes and in order to guarantee the security and the confidentiality of the data. The documentation is archived both electronically and on paper.

Here below some significant information



The **collection** of personal data is specific and limited to what is **strictly necessary** for each specific purpose of the processing



The **processing** of personal data is **limited to the purposes** for which they were collected



The **storage** of personal data is limited to the **minimum necessary** for every specific purpose of the processing



Sensitive personal data collected and processed might be stored in paper and/or electronic format according to appropriate security measures



Personal data **won't be** provided to commercial third parties



Personal data **won't be** sold

7- DATA DIFFUSION AND CATEGORIES OF SUBJECTS



Personal data will be known and processed, in compliance with current legislation on the subject, by the staff of Insul.Tecno, identified as Data Processor and/or System Administrators.

Personal data collected and processed might be communicated, within listed above limits set out listed above, also to the following subjects or categories of subjects:

- Subjects to whom communication is required by law, by regulation or by national and EU legislation as well as for the performance of contractual or pre-contractual obligations.
- Freelancers, for the purposes of patronage or counseling
- Third parties who collaborate with Insul.Tecno in order to provide the requested service
- To all of the recipients of the communication campaigns of Insul.Tecno

The data are processed for the activities conducted by Insul.Tecno within the terms provided by national and community laws, rules and regulations.

Pursuant to EU Regulation 679/2016, the updated regulations which provide for obligations according to which the processing of sensitive data could be carried out, are available at the Insul.Tecno headquarters, in person or represented by legal representatives.

These data might be communicated, for the intended purpose, only when required by law or regulation.

Notwithstanding to the communication or spread of data, in compliance with the law, if required by police forces, by juridical authorities, or by public entities, for purposes of defense or security on the State or prevention, assessment or repression of crimes.

8 – RIGHTS OF THE INTERESTED PARTY – art. 15 EU Regulation 679/2016



Pursuant to the art. 15 EU Regulation 679/2016 (*Access rights of the interested party*), the interested party may exercise its rights towards the Data Controller or Data Processor, by contacting the address indicated in the Foreword by registered mail, return receipt, fax, e-mail or PEC at any time.

In order to guarantee the correct exercise of the rights, the interested party must be unequivocally identifiable.

Insul.Tecno will provide feedback **within 30 days** and, if unable to provide the required data in time, to justify the possible extension.

The response will be free of charge except in cases of groundlessness (eg. there are no data concerning the applicant) or excessive requests (eg. repetitive over time) for which a fee might be charged, not higher than the costs actually incurred for the research on the specific case.

The rights related to the personal data concerning deceased people may be exercised by those who have an interest of their own or which acts to protect the subject that for family reasons deserving protection.

The interested party has the right to lodge a complaint with the Supervisory Authority. In Italy, the complaint can be presented to the Guarantor for the Protection of Personal Data. More information about the procedures of presentation are available on the website of the Guarantor, at <http://www.garanteprivacy.it>.

If Insul.Tecno is subjected to a violation of the personal data given to it, it will proceed to notify the competent Control Authority **within 72 hours** of its occurrence and will also communicate the event to the interested party, except in case of exclusions laid down by law.

Rights of the Interested Party – art. 16 – 21 EU Regulation 679/2016	
The interested party has the right to obtain indication	The interested party has the right to obtain
about the origin of personal data	confirmation of the existence, or not, of personal data and that such data are made available in an intelligible form
about the purposes and procedures of treatment	confirmation of the existence, or not, of their personal data and that such data are made available in an intelligible form
about the logic applied in case of treatment carried out with the aid of electronic instruments	updating, rectification, data integration and limitation
about the identificational details of the Data Controller, and of the designated Responsible (Article 5, paragraph 2 of Legislative Decree 196/2003 and Article 3, paragraph 1, EU Regulation 679/2016)	cancellation, transformation into anonymous form or blocking of data processed in violation of the law (including those for which storage is not necessary for the purposes for which they were collected or subsequently processed)
about the subjects or the categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the territory of the State, managers or agents	certification that the operations referred to in points listed above have been brought to the attention of those to whom the data have been communicated or spread, except in the event where this fulfillment is impossible or involves the use of resources clearly disproportionate to the protected right from the organization
about the existence of a profiling process	copy of the data being processed and their portability
The interested party has the right to object	
to the processing of personal data concerning the data subject including profiling for legitimate reasons, even if pertinent to the purpose of the data collection	
to the processing of personal data concerning the data subject for the purposes of: sending advertising material, direct sales, carrying out marketing research, commercial communications	
to the processing of data processed for scientific or historical research purposes or for statistical purposes, except in the event of public interest in processing	

The undersigned, read and understood the above information:

a) ☐ agrees / ☐ does not consent to the processing of data as specified above

b) ☐ agrees / ☐ does not consent to the processing of data for sending information, advertising, promotional material, commercial proposals or other communications by Insul.Tecno; if so, indicate for which of the following data this treatment is allowed:

☐ Mailing address ☐ Fax ☐ E-mail address ☐ Phone number ☐ SMS

DATE e SIGNATURE