



Privacy Policy for customers

Update: August 4th, 2022



Dear Customer, in accordance with the Regulation on the protection of individuals with regard to the processing of personal data and on the free movement of such data, namely Regulation (EU) No 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereafter, also, the "Regulation"), Sacchi Giuseppe S.p.a. (hereafter, also, the "Company"), informs its Customers that it would act as Data Controller of such data.

The following information will be useful to understand:

- the Data Subject's rights and how to contact the Data Controller;
- how the Data Subject's data are collected and the purposes of their processing.



Data Controller

Sacchi Giuseppe S.p.A. is the Data Controller and in its role provides to the Data Subjects with the following information. In its role, the Data Controller ensures the protection of personal data in compliance with the regulation and with the principles and obligations of confidentiality and privacy to which the Data Controller adheres. The registered office of the Data Controller is in Via Privata G. Sacchi 2 – 23891 Barzanò (LC); **Contact: Tel +39 0362 6351 - fax +39 0362 635401.**



Information to be provided

The personal data are collected in compliance with the Regulation and with the principles and obligations of confidentiality and privacy to which the Data Controller adheres. Therefore, the Data Controller is committed to process the personal data in compliance with the principles of fairness, lawfulness, transparency with the following purposes. Only authorized personnel trained to ensure their confidentiality and privacy process the personal data.

The Data Controller processes any type of information, identified or identifiable, and collected from the Data Subject and could include name, surname, nationality, contacts (including address, phone number and email address) data and place of birth, civil status, economic and financial information, details of ID documents, bank accounts, payment's information.

The personal data are processed for the following purposes: purposes closely related and essential to the provisions of the existing contract between the Data Controller and the Data Subject (e.g., credit rating, financial solvency through credit information systems, credit accounts management, current account deposits, fiscal declarations, invoicing services, shipping documents, delivery notes, etc.);

- purposes connected to the obligations laid down by all the laws, regulations and directives issued by the Public Authorities, national and European, and

by the Supervising Authorities. The data Controller can dispose of an electronic tablet of the signature, without retaining the signature itself;

- legitimate interest of the Sacchi and Sonepar Group as regards customer and suppliers management and experience improvement;
- exercise or waive a right in Court proceedings or in administrative proceedings in all the cases laid down by all the laws, regulations and directives issued by the Public Authorities, national and Europeans.

The provision of personal data necessary for such purposes is mandatory in order to fulfil the contract and the refusal to provide them may result in the impossibility for the Data Controller to provide the service.

The Data Controller, only upon the informed consent of the Data Subject, may use the personal data for the following purposes:

- marketing purposes (i.e. promotional, commercial and advertising activities, newsletters), market surveys, consumer researches, customer satisfaction assessments, promotional materials;
- customer profiling, with automated and non-automated processing, with the purpose of customizing the offer in compliance with the preferences of the customer.

The Data Controller, only upon the informed consent of the Data Subject, may use the

personal data exclusively in compliance with the purposes of the art. 9 of the Regulation.

The provision of personal data necessary for such purposes is not mandatory in order to fulfil the contract and the refusal to provide them will not prevent the Data Controller from providing the service.

Retention period of personal data

The Data Controller keeps personal data for a period of 10 (ten) years from the termination of the contractual relationship with its customers, without prejudice to the art. 17 of the Regulation.

Transfer and access to personal data

The Data Controller - without the consent of the Data Subject - may transfer the personal data to:

- companies of the Sacchi and Sonepar Group, with the aim of executing administrative and service activities, and provide value added services and experiences to their suppliers and customers;
- third parties (e.g. law firm, accountants, consultants, insurance) appointed as external data controller or data processor;
- judicial Authorities, Revenue Agency, Authorities of European or Non-European countries to provide answers to their requests in accordance with the regulation applicable time by time, in particular referring to the prevention of criminal offences. These subjects will process the personal data as external data controllers.

Storage of the personal data

The Data Controller will not transfer the personal data outside the EU Area. However, should it be necessary to transfer personal data outside the EU Area, due to server's location or to the necessities of the Sacchi or Sonepar Group, such transfer shall be subject to the Regulation.

Video Surveillance (CCTV)

The Data controller informs the customer that a video surveillance system (CCTV) is in operation in the branches and in its Headquarters.

The personal data are collected in compliance with the regulation and with the principles of lawfulness and confidentiality for the purpose of protecting and preserving the Data Controller's business assets.

The lawfulness of the processing of the personal data is based on the legitimate interest upon art. 6, 1st paragraph, lett. f) of the Regulation, with the aim of protecting the private property of the Data Controller and fraud preventing.

The data processing shall be based upon the General Measure of the Italian Data Protection Authority 8th April 2010.

The provision of personal data necessary for the abovementioned purposes is not mandatory.

The images are recorded on electronic devices for a period of 72 hours from the registration.

Afterwards, the images are cancelled, except for specific purposes related to festivity, office closures or in case of a request from the Public Authority.

The images are overwritten to the previous ones.

The images shall not be disseminated to third parties except upon request of the Public Authorities.

The images shall be accessed only by authorized personnel appointed by the Data Controller.

The presence of a video surveillance camera (CCTV) is always signalled by a first layer information (warning sign).



Personal data access right

With relation to the provided personal data, the Data Subjects shall exercise the following rights guaranteed by the Regulation:

- access right;
- right to ask a confirmation of the data process;
- right to rectification, modification and cancellation of personal data or the right of restriction of the processing of the former;
- right to object the processing;
- right to withdraw the consent;
- right to send a complaint to the competent Supervisory Authority;
- right to portability of the data processed by the Data Controller.

For these purposes, the Data Controller has a specific section on its website to exercise the abovementioned rights sending a written communication to the following email.

Email: [**privacy@sacchi.it**](mailto:privacy@sacchi.it)

The Data Controller is committed to answer to the request no later than 1 (one) month, except for specific cases, where the Data Controller may take up to 3 (three) months. The Data Controller will keep the Data Subject updated.

The Data Subject shall be informed in writing whether the request has been granted. In case of request of rectification, cancellation or restriction of the data processing, the Data Controller shall inform the Data Subject whether the request has been accepted or not.

The right to withdraw the consent shall not affect the lawfulness of the previous data process until its withdrawal.

The Data Controller may apply for a contribution shall the request be unfounded. The Data Controller has a register to track all the requests.

CONSENT TO THE INFORMATION TO BE PROVIDED

I, the undersigned, _____, acting as the Legal Representative of

_____; VAT No

_____, client code Sacchi Giuseppe S.p.A.

_____, in relation to the information to be provided, which is deemed to be referred to in full

herein and in relation to the Regulation EU 679/2018, I declare the following:

marketing purposes: i.e. to invite to take part to promotional activities, advertising related to the products and services that are marketed, to send newsletters or marketing emails, sms, mms, fax, to take part to the surveys which are always on a voluntary basis, to send offers of products or services that are marketed.	<input type="checkbox"/> I agree <input type="checkbox"/> No, thank you
collection, treatment and communication of personal data by the Data Controller to third parties indicated in the abovementioned document for the purposes of profiling customers with the use of automated and non-automated processes and in compliance with the principles and purposes indicated in the abovementioned document.	<input type="checkbox"/> I agree <input type="checkbox"/> No, thank you
Date _____	<p style="text-align: center;">Signature and Stamp</p> <p>_____</p>