



Crippacampeggio s.r.l.

20841 Carate Brianza (MB) – Via del Dosso 9

Tel. 0362/901988 - Fax 0362/991103

www.crippacampeggio.it - info@crippacampeggio.it

PRIVACY POLICY FOR CRIPPA CAMPEGGIO SRL CLIENTS AND PROSPECTS

Crippa Campeggio S.r.l. (Hereinafter also referred to as the "Company") issues the privacy policy mentioned above according to Article 13 of EU Regulation 2016/679 (hereinafter also referred to as "GDPR") in compliance with the principles of correctness, lawfulness, transparency and confidentiality, without prejudice to the changes and adaptations needed following national, European, and Supervisory authorities provisions that come into effect after the publication of this document.

1. Source of the personal data

The Personal Data collected, subject to processing, are provided by the Client during the sale phase. The data of the potential Client (hereinafter "Prospect") is collected in the pre-contractual phase when an offer is requested.

2. Nature of the processed data

The processing covered by this privacy policy concerns common personal data such as, by way of example and not limited to company name/personal data, tax code/VAT number, telephone number, e-mail address, IBAN.

3. Purpose of the processing

The personal data will be collected and processed for the following purposes:

- a) **pre-contractual purposes:** to respond to requests made by the Prospect and/or by the Client and for any further activity instrumental to the subscription and/or activation of the Services offered by Crippa Campeggio Srl;
- b) **contractual purposes:** for the sale of products and services including support services and accessories that may be requested by the Client for the technical, administrative and accounting management of complaints and disputes; for sending information and service communications;
- c) **purposes of fulfilling obligations under EU and national regulations**, including law, *pro tempore* regulations in force and provisions, including those imparted by legitimated Authorities, as well as for purposes related to the investigation and prosecution of criminal offences;
- d) **purposes related to the contract** to proceed with the sale of specific products or services, some personal data from public archives or registers are used relating to any prejudicial protests, registrations or transcripts (such as foreclosures, insolvency proceedings, seizures, mortgages, legal proceedings) and the chamber of commerce and balance sheet data. This data is acquired by accessing the IT systems of authorised companies and is processed, where necessary, exclusively to verify the reliability and punctuality of payments. Crippa Campeggio Srl may also process data on the Client's status and punctuality in paying for the Services provided in the past: such information, once acquired by the company, will be stored and processed to protect Crippa Campeggio Srl's credit claims, to assess any further acceptances and/or contractual proposals that can be signed by the Client;
- e) **direct marketing:** for sending advertising material, commercial communication relating to the Products and/or Services offered by the company; this activity may be carried out, subject to express consent, by sending advertising/information/promotional material to both Clients and Prospects.

4. Processing methods and logic

Crippa Campeggio Srl processes the data using manual instruments and electronic and automated means. Data processing will be carried out with the logic of organisation and processing of the data of related Clients/Prospects related to the purposes referred to in this policy that guarantees the security and confidentiality of the data. More precisely, the data will be stored on servers, protected from theft or alteration using special archiving and IT security systems.



Crippacampeggio s.r.l.

20841 Carate Brianza (MB) – Via del Dosso 9

Tel. 0362/901988 - Fax 0362/991103

www.crippacampeggio.it - info@crippacampeggio.it

5. Storage times

Personal data will be processed by Crippa Campeggio Srl for the entire duration of the contract and also subsequently to assert or protect its rights. Crippa Campeggio Srl may also process this data for a maximum period of 24 months for the purposes referred to in point 3 letter e) to which the Client/Prospect may oppose in the manner indicated in point 10. After the termination of the signed contract, the data may be processed exclusively for administrative and/or legal purposes (e.g. in the case of offences such as fines, damage, theft, etc.) and execute obligations deriving from the applicable *pro tempore* regulatory and normative framework. The data will be deleted at the end of the period necessary for the purposes above.

6. Categories of subjects to whom the data may be communicated

For the pursuit of the purposes above, Crippa Campeggio Srl may need to communicate the personal data of Clients/Prospects to third parties in Italy to execute the contract, fulfil legal obligations or perform activities instrumental to the services requested. These subjects belong to the following categories:

(a) Public authorities and supervisory and control bodies when required by specific legislative, regulatory and authorisation provisions;

(b) Subjects who perform on behalf of Crippa Campeggio Srl tasks of a technical or organisational nature; subjects who perform support or instrumental services for the execution of the contract; subjects who acquire and process data needed for clients to use the services; subjects who carry out archiving and data entry activities; firms and companies who offer assistance and consulting, including legal consulting; subjects who control, revise and certify the activities carried out by Crippa Campeggio Srl also in the interest of its clients and users; factoring companies, credit or banking institutions and credit card companies; and insurance companies;

(c) external companies who operate in the credit recovery sector including deferred payments, when permitted by current legislation, to prevent and control the risk of insolvency, fraud control and credit protection, to this end appoint external data processors;

The subjects belonging to the above categories process personal data as independent Data Controllers or as external Data Processors appointed explicitly by Crippa Campeggio Srl.

The list of External Data Processors is available to the data subject, who explicitly requests it from the Data Controller's registered office.

According to Article 4, letter 10 of the GDPR, all employees, consultants, collaborators and/or any other "natural person" who carry out their activities based on the instructions received from Crippa Campeggio Srl are named "subjects authorised to processing". Crippa Campeggio Srl provides the Operators and authorised persons with adequate operating instructions for the adoption of technical and organisational measures appropriate to ensure the confidentiality and security of data.

7. Nature of consent and legal basis

The Client must provide personal data for the stipulation and execution of contractual relationships, to comply with legal obligations or for reasons of legitimate interest as specified in point 3 letters a), b), c) and d) (under Article 6, letters b), c) and f) of the GDPR). If the Client refuses to provide this data, it would be impossible for Crippa Campeggio Srl to proceed with the execution of the stipulated contract.

In relation to the purpose of the processing referred to in point 3, letter e), of this Privacy Policy, the Client/Prospect's consent to the processing of data is optional and can always be revoked. Crippa Campeggio Srl may send the Client/Prospect commercial communications relating to products and/or services similar to those already provided, using the e-mail



Crippacampeggio s.r.l.

20841 Carate Brianza (MB) – Via del Dosso 9

Tel. 0362/901988 - Fax 0362/991103

www.crippacampeggio.it - info@crippacampeggio.it

coordinates indicated by the same on these occasions, to which the Client/Prospect may oppose in the manner stated in point 10.

8. Further information

Any updates to this Privacy Policy will be immediately made available on Crippa Campeggio Srl's website and its commercial channels.

9. The Data Controller

The Data Controller is Crippa Campeggio Srl in the person of its Legal Representative and with registered office at Via del Dosso, 9 - 20841 Carate Brianza (MB).

10. The Data Subject's rights

According to Articles 15 and following of EU Regulation 2016/679, the data subject is granted the exercise of specific rights. In particular, the data subject can:

- obtain confirmation of the existence of personal data concerning you, even if not yet registered, the access, the data, and their origin as well as the purposes, storage times, processing methods and the logic applied in case of processing performed with automated tools;
- revoke any consent given regarding the processing of data for marketing purposes, without prejudice to the lawfulness of the processing carried out up to that time;
- receive the personal data processed in a structured and standard format that can be read by automatic devices and, unless it is not technically feasible, directly transmit your data to another Data Controller;
- obtain the cancellation, transformation into anonymous form or block the data processed that does not require storage for the purposes for which it was collected and processed;
- update, correct, and integrate the data processed;
- oppose, in whole or part, for legitimate reasons, the processing of personal data even pertinent to the purpose of the collection;
- lodge a complaint with the Supervisory Authorities.

It is specified that the exercise of these rights must not prejudice and/or damage the rights and freedoms of others.

You can exercise these rights at any time by sending an e-mail to Crippa Campeggio Srl, Via del Dosso, 9 - 20841 Carate Brianza (MB) at the following e-mail address: privacy@crippacampeggio.com

It is understood that, where requests are submitted by electronic means, the information will be provided free of charge and in a commonly used electronic format.

If the requests of the data subject are manifestly unfounded or excessive, in particular, due to their repetitive nature, the Company may alternatively: charge a reasonable expense contribution taking into account the administrative costs incurred to provide the information or communication, to take the necessary action; or refuse to fulfil the request. In both circumstances, the Company provides the data subject with adequate justification.



Crippacampeggio s.r.l.

20841 Carate Brianza (MB) – Via del Dosso 9

Tel. 0362/901988 - Fax 0362/991103

www.crippacampeggio.it - info@crippacampeggio.it

According to Article 13 of EU Regulation 2016/679, the Data Subject states to have read and understood this Privacy Policy;
Furthermore, the Data Subject gives consent to the processing of personal data for the sending of commercial communications for marketing purposes, as indicated in point 3, letter e) of this order form.

I give my consent I deny my consent

_____ (date), _____

Legible signature
