

INFORMATION ON THE PROCESSING OF PERSONAL DATA RELATED TO THE RELATIONSHIP WITH CUSTOMERS AND POTENTIAL CUSTOMERS

The following information is intended for natural persons, including professionals, sole proprietors, and representatives/contacts of companies, organizations, associations, and foundations, hereinafter referred to as "Data Subjects".

Identity and contact details of the Data Controller

Manifattura Falomo s.r.l., hereinafter also referred to as "Manifattura Falomo" or "Controller", with registered office at via Feletti, 21 – 33075 – Morsano al Tagliamento (PN), e-mail info@manifatturafalomo.it, PEC manifatturafalomo@cert.neispa.com or +39 0434 697132.

Categories of data and their source

Manifattura Falomo processes personal data of a general nature (e.g. credit-related information). Such information may be collected from the data subject to whom it relates and/or from third parties (e.g. commercial information companies).

Purposes and legal bases

- A. Pre-contractual phase management:** Personal data is processed for all needs related to the processing of requests for information and/or quotations.
- B. Collection of commercial information:** Personal data is processed to collect information for checks on the economic, financial, and asset situation of the Data Subjects, as well as their solidity, solvency, and reliability.
- C. Management of the contractual phase:** Personal data is processed for all needs related to the management of the contractual relationship in all its phases (e.g., appointment management, logistics organization, management of customer support activities, and compliance with legal obligations incumbent upon the Controller).
- D. Soft Spam:** the e-mail address provided in the context of the contract is used to promote products or services similar to those already sold or provided, respectively.
- E. Defensive purposes:** The Controller may need to process personal data for the management of pre-litigation or litigation disputes, both judicial and extrajudicial.

Purposes	Legal base (common data)	Legale base (special data)
A.	Execution of pre-contractual measures.	/
B.	Legitimate interest of the Controller related to the analysis and definition of business strategies and policies, the identification of subjects suitable for initiating or continuing commercial relationships, payment methods and conditions, and fraud prevention.	/
C.	Execution of the contract; Fulfillment of legal obligations.	/
D.	Legitimate interest provided for by law.	/
E.	Legitimate interest of the Controller in establishing, exercising, or defending a right.	Establish, exercise, or defend a right.

Retention period

Purposes	Retention period
A.	Time necessary for processing received requests and subsequent communications.
B.	Time necessary for conducting checks.
C.	10 years from the termination of the contract.
D.	24 months from the last purchase.

E.	10 years from the final resolution of the dispute.
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Nature of provision and consequences of refusal

Purposes	Nature	Consequences
A.	Necessary	Impossibility to receive the requested information.
B.	Non applicable	/
C.	Necessary	Impossibility of entering into or continuing the commercial relationship.
D.	Optional	Impossibility to receive promotional communications relating to products or services already sold or provided.
E.	Necessary	Impossibility to manage the litigation.

Scope of communication

Data is processed by authorized internal personnel for specific tasks and is communicated externally according to the following rules:

Purposes	Categories of external recipients
A.	Commercial consultants, business brokers.
B.	Commercial information companies, agents.
C.	Insurance companies or credit assignment, agents, credit institutions, external consultants, subjects to whom communication is mandatory by law, business partners (customers/suppliers).
D.	Companies providing hosting and/or technological platform management services.
E.	Law firms; recovery or assignment of credit companies; Judicial Authority.

Since data is also processed using IT tools, it may also be visible to personnel providing assistance/maintenance on such systems.

Transfer of data to a third country or international organization

The Controller carries out transfers of personal data to the countries and under the conditions summarized below:

Finalità	Paese	Condizione di liceità del trasferimento
A.	/	/
B.	/	/
C.	/	/
D.	Australia	Standard Contractual Clauses
E.	/	/

Rights of Data Subjects

The following rights are recognized to the individual to whom the personal data refers:

- **Access:** it is possible to know if there is ongoing processing of personal data and, if so, to obtain access to it and request a copy.
- **Rectification:** it is possible to request the update of personal data, their correction (if inaccurate), and the integration of incomplete data.
- **Erasure:** it is possible to obtain the erasure of personal data under certain conditions (for more information, contact the Controller).
- **Restriction:** it is possible to request that data be marked, limiting their processing in the future, under certain conditions (for more information, contact the Controller).
- **Objection:** it is possible to object to the processing of personal data for reasons related to one's particular situation, where the processing is based on legitimate interest or is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller.
- **Portability:** it is possible to receive personal data provided to the Controller in a structured format and to transmit them to another controller, where processing is based on consent or contract and is carried out by automated means;

- **Withdrawal of consent:** it is possible to withdraw consent for the purposes that required it, without prejudice to the lawfulness of the processing carried out up to that moment.

The concrete rights exercisable regarding the processing activities carried out are:

Purposes	Right exercisable						
	Access	Rectification	Erasure	Restriction	Objection	Portability	Withdrawal of consent
A.	X	X	X	X			
B.	X	X	X	X	X		
C.	X	X	X	X		X	
D.	X	X	X	X	X		
E.	X	X	X	X	X		

To exercise the aforementioned rights, you can use the form available at the following link <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and send it to the following address: privacy@manifatturafalomo.it. The Data Subject may request from the same address further details regarding the information provided above (e.g., legitimate interest balancing test or list of data processors).

It is possible to lodge a complaint with a supervisory authority: for Italy, the Garante per la Protezione dei Dati Personali (www.garanteprivacy.it).

Manifattura Falomo Srl

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