

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

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

### **Identity and contact details of the Data Controller**

SIME-TEK S.p.a., hereinafter also referred to as "Sime-Tek" or "Controller," with its registered office at Via delle Fornaci 50 – 33084 Cordenons (PN), can be contacted via email at [info@sime-tek.com](mailto:info@sime-tek.com), PEC at [sime-tek@pec.it](mailto:sime-tek@pec.it), or by phone at +39 0434 921972.

### **Purposes and legal bases**

- A. Pre-contractual phase management:** Personal data is processed for all needs related to responding to requests for information and/or quotes.
- B. Contractual phase management:** Personal data is processed for all needs related to managing the contractual relationship in all its phases (e.g., appointment management, logistics organization, customer support activities, and compliance with legal obligations).
- C. Soft Spam:** The email address provided within the contract is used to promote products or services similar to those already sold or provided.
- D. Defensive purposes:** The Controller may need to process personal data for managing disputes and legal proceedings.

Purpose	Legal basis (common data)	Legal basis (special data)
A.	Execution of pre-contractual measures	/
B.	Execution of the contract; Compliance with legal obligations	/
C.	Legitimate interest provided by law	/
D.	Legitimate interest of the Controller to ascertain, exercise, or defend a right	Ascertain, exercise, or defend a right

### **Retention period**

Purpose	Retention period
A.	Time necessary to respond to requests and subsequent interactions
B.	10 years from the end of the contract
C.	Until the service ends or the Data Subject unsubscribes
D.	10 years from the final resolution of the dispute

### **Nature of provision and consequences of refusal**

Purpose	Nature	Consequences
A.	Necessary	Inability to receive the requested information
B.	Necessary	Inability to initiate or continue the commercial relationship
C.	Optional	Inability to receive promotional communications related to products or services already sold or provided
D.	Necessary	Inability to manage the dispute

### **Scope of communication**

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

Purpose	Categories of external recipients
A.	Commercial consultants, business brokers
B.	Insurance companies or credit transfer companies, agents, credit institutions, external consultants, entities to which communication is mandatory by law

Purpose	Categories of external recipients
<b>C.</b>	Marketing consulting companies, companies offering hosting/technology platform management services
<b>D.</b>	Legal firms; credit recovery or transfer companies; Judicial Authority

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

### Data transfer to a third country or international organization

The Data Controller may need to transfer data in the context of relationships with business partners established outside the European Economic Area, as well as due to the use of IT services (cloud, backup, etc.): in all these cases, transfers will be made in accordance with the specific provisions of personal data protection regulations, using standard contractual clauses where otherwise not possible.

### Rights of Data Subjects

The individual to whom the personal data refers has the following rights:

**Access:** You can know if your personal data is being processed and, if so, obtain access to it and request a copy.

**Rectification:** You can request the update of your personal data, its correction (if inaccurate), and the integration of incomplete data.

**Deletion:** You can obtain the deletion of your personal data under certain conditions (for more information, contact the Controller).

**Restriction:** You can request that data be marked to limit future processing under certain conditions (for more information, contact the Controller).

**Objection:** You can object to the processing of personal data for reasons related to your 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; you can also object to the processing of personal data for direct marketing purposes.

**Portability:** You can receive your personal data in a structured format and request its transmission to another data controller if the processing is based on consent or contract and is carried out by automated means.

**Withdrawal of consent:** You can withdraw consent for purposes that required it, without affecting the lawfulness of processing based on consent before its withdrawal.

The rights that can be concretely exercised concerning the processing activities carried out are:

Purpose	Exercisable right						
	Access	Rectification	Deletion	Restriction	Objection	Portability	Withdrawal of consent
<b>A.</b>	X	X	X	X			
<b>B.</b>	X	X	X	X		X	
<b>C.</b>	X	X	X	X	X		
<b>D.</b>	X	X	X	X	X		

To exercise the above rights, you can use the form available at the link <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and send it to the following address: [info@sime-tek.com](mailto:info@sime-tek.com). The Data Subject can request more details regarding the above information (e.g., balancing test of legitimate interest or the list of data processors) at the same address.

You can lodge a complaint with a supervisory authority: for Italy, the Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

