



Data privacy model collected data and purposes Information pursuant to and for the purposes of art. 13-14, EU Reg 2016/679 (European regulation on the protection of personal data)

Introduction

EU General Data Protection Regulation (GDPR) 679/2016 will be effective from 25/05/2018.

Therefore:

- We inform that in compliance with the new GDPR, **MERCURY s.r.l.** modified its Policy, for this purpose we are submitting this information notice;
- **MERCURY s.r.l.** is authorized to personal data processing only in the cases stated in the Policy;
- We invite you to read carefully the Privacy Policy updated according to the new EU Regulation.
- **MERCURY s.r.l.** commits to privacy protection of any person involved and declares itself responsible for clients' data safety. We will be clear and transparent in data collection and processing.

This information notice provides information about the following matter:

- Data Controller
- The List of personal data processing (GDPR article 30 letter C)
- Purposes for personal data processing (GDPR article 30 letter B)
- Personal data processing and communication
- Field of application and resources used for data processing
- Risk analysis
- Surveillance criteria for external officers
- Data protection officer
- Rights of the Data Subject
- Declaration of commitment and signature

1. Purpose, legal basis of the processing for which the data are intended

The processing of personal data supplied by you is aimed solely at performing contractual obligations and fulfilling specific requests, as well as fulfilling regulatory obligations, in particular accounting and tax obligations.

The legal basis of the processing means the source / origin / justification of the treatment in a legal provision, in the fulfillment of a contract, in the satisfaction of a request by the interested party. If there is a legal or contractual obligation, more precise information must be provided.

2. Processing Methods

In relation to the indicated purposes, your data are processed electronically and on paper. The processing operations are carried out in such a way as to guarantee the logical, physical security and confidentiality of your personal data.

3. Fraud Prevention

The personal data of the interested party, with the exclusion of those particular (Art 9 GDPR) or judicial (Art 10 GDPR) will be processed to allow controls for the purpose of monitoring and preventing fraudulent payments, by software systems that carry out a verification in order automated and preliminary to the negotiation of services / products. Personal data collected for fraud purposes will be immediately deleted at the end of the control phases (Recital 47 and Article 22 of the GDPR).

4. Legitimate interests pursued by the data controller or third parties

Need to process the data for own or third parties purposes for the sole purpose of providing the corporate services in an appropriate manner.



5. Personal data nature

Your personal, particular and judicial data concerning the performance of the service requested by you are processed. During the service delivery it may be necessary to acquire and carry out processing operations of your personal and judicial personal data. You are asked to express your consent in writing.

6. Mandatory or optional nature of the contribution

The conferment of your personal and particular data is not compulsory, but any refusal could make it impossible or extremely difficult to provide the services you requested.

7. Communication scope and data dissemination

Your data may be communicated to:

- all subjects to whom access to such data is recognized by virtue of regulatory provisions;
- to our collaborators, employees, as part of their duties;
- to all those natural and / or juridical persons, public and / or private, when the communication is necessary or functional to the performance of our activity and in the manner and for the purposes illustrated above (eg commercial study, revenue agency, etc.)

8. Mode and duration of personal data retention

Your data will be kept only for the period necessary to carry out the activities related to the specific type of certain data, or for the necessary time of conservation according to the law to carry out the required operations; therefore:

- 10 years for administrative and fiscal data;
- 5 years for informational telematic conversations (eg e-mail).

9. Data Controller

MERCURY s.r.l. Controller is the President or any other delegate with necessary powers of representation.

The Data Controller tasks and responsibilities are defined by EU Code and Regulation.

The Data Controller identifies safety measures use and improve and watches over their application to grant and prove that personal data processing is compliant with the Code and Regulation. The Data Controller appoints the Data Processor defining their tasks.

Furthermore, according to GDPR article 33 and following, in case of personal data breach, the Data Controller, must notify that breach to the competent authority (GDPR article 55) as soon as possible and no later than 72 hours since the moment he first acknowledges the breach, except in case of risk for rights and freedom of natural persons.

The updated list of Data Controllers and Appointees is kept at the Data Controller legal address.

10. Rights of the Data Subject

According to article 7 of the Privacy Code and the article 15 of GDPR, the Data Subject has the right to obtain confirmation from the Controller as to whether or not personal data concerning them is being processed even if is not recorded, and their express notification, more specifically:

- 1) Obtain confirmation from the Controller as to whether or not personal data concerning them is being processed even if is not recorded, and their express communication.
- 2) Obtain information about the following matters:
 - a) The origin of personal data.
 - b) Aim and modalities of processing.
 - c) The logic applied in case of processing performed with the aid of electronic devices
 - d) The identity of the Controller, Processor and representative, as provided for by article 5 subsection 2 of the Privacy Code and article 3 subsection 1 of GDPR.
 - e) The recipients or categories of recipient to whom the personal data have been or will be disclosed when they act as representatives designated in State's territory, as well as processors or Appointees.
- 3) Obtain the following:



- a) Data update, rectification, or, when interested, inclusion.
- b) Erasure, transformation into anonymous form or interruption of processing when it is unlawful, including the data the Controller no longer needs for the purpose of processing.
- c) The notification of the activities previously mentioned on a) and b). Such notification must refer to the content, the recipients to whom the personal data have been disclosed, unless this proves impossible or involve disproportionate effort.
- 4) The right to object, totally or partially:
 - a) On grounds relating to their particular situation, even if relevant to the scope of processing.
 - b) When personal data are processed for direct marketing purposes such as publicity, direct sales, marketing research or commercial communication through the use of automated systems without an operator's intervention, or through email and/or traditional marketing modalities such as telephone or paper mail.

Please note that the Data Subject's right to object to direct marketing purposes through automated systems, mentioned in b), is also extended to the use of traditional means, besides, it is possible to exercise the right of object even partially. Therefore, the Data Subject may choose if receiving communications through traditional or automated means, or none of them. When applicable and as provided for by articles 16-21 of the GDPR, Data Subjects have the rights of rectification, right to be forgotten, right of interrupting the processing, right to data portability and right to object as well as the right of complaint to the Data Protection Authority.

11. Revocation to treatment consent

You have the right to revoke your consent to the processing of your personal data by sending a registered A / R to the following address: **MERCURY s.r.l.** based in **via Galilei,67 - 31010 Mareno di Piave (TV) ITALY** accompanied by a photocopy of your identity document, with the following text: "revocation of consent to processing of all my personal data ". At the end of this operation your personal data will be removed from the archives as soon as possible. If you would like more information on the processing of your personal data, or exercise the rights referred to in paragraph 10 above, you can send a registered letter to the following address: **MERCURY s.r.l.** based in **via Galilei,67 - 31010 Mareno di Piave (TV) ITALY**. Before we can provide you, or change any information, you may need to verify your identity and answer some questions. An answer will be provided as soon as possible.

Final Considerations, declaration of commitment and signature

This document derives from the analysis of the issues regarding the official application of the EU Regulation 679/2016 previously mentioned. A copy of this document is attached to the notifications sent to recipients, in order to give information about the tasks and rules to comply with in the context of the activities performed by **MERCURY s.r.l.**

This document is signed at the bottom by Mr. **FABIO CATTAI** as Legal Representative of **MERCURY s.r.l.**

In case this document must be shown for control, it is keep at **MERCURY s.r.l.**

A copy will be submitted to:

- The appointed Privacy Contacts;
- Whomever requests it in case of any rapport involving Data Processing.

Mareno di Piave (TV) ITALY, 25/05/2018