

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA**

of the users who consult the GSKET Website in accordance with Art. 13 of the Regulation (EU)2016/679

### **INTRODUCTION**

In accordance with Regulation (EU) 2016/679 (hereinafter "GDPR") and Legislative Decree no. 196/2003 (Privacy Code), this page provides information on how **GSKET Srl** (hereinafter, GSKET) collects and processes personal data through the use of the Website **www.gsket.com**.

This information does not concern other websites, pages or online services that can be accessed via hypertext links that may be published online but which refer to resources outside the GSKET domain.

### **CONTROLLER**

GSKET, with registered office in Via Leonardo da Vinci 5, 26020 Ticengo (CR), is the Data Controller who processes the data collected through the website **www.gsket.com**.

If users have any question about this privacy policy, including any request to exercise their legal rights, they can contact the data controller at the following address: [amministrazione@gsket.com](mailto:amministrazione@gsket.com).

### **PURPOSE OF PROCESSING**

**GSKET** processes personal data provided by Customers, individuals, companies, corporations professionals, only for the purposes specifically identified in this privacy policy and in compliance with the legislation in force.

#### **Type of processing**

(Customer relationship management activities. The processing includes the registration of customers and/or natural persons operating in their name and on their behalf, the management/archiving of invoices issued to customers, also in electronic format, the management of communications to customers through different contact channels (such as business cards, ordinary correspondence, e-mail, electronic invoicing, telephone, fax, cloud).

#### **Nature**

(Tax code and other personal identification numbers; Name, address, IP address or other personal identification; contact details, such as telephone number, e-mail; Bank details, debit/credit card details; Solvency and bankruptcy details)

#### **Purpose**

(Sales consultancy activities, fulfilment of pre-contractual, contractual and tax obligations arising from new or existing relationships; fulfilment of obligations under law, regulation, EU legislation or orders of Authority; to exercise the rights of the Data Controller, to carry out marketing activities on products or services similar to those purchased by the Data Subject; to carry out marketing activities on products and services other than those

purchased by the Data Subject; to send newsletters or other information and promotional material relating to activities, products, services and surveys ("customer satisfaction"); to carry out behavioral targeting activities; to process statistics and market research; to carry out analysis and reporting activities related to promotional communication systems, such as the detection of the number of open emails, the number of clicks on the links, the type of device used and the operating system; to carry out profiling activities that allows Data Controller to offer commercial proposals in line with user's profile.

**Type of personal data** (Common data)

### **LEGAL BASIS FOR PROCESSING**

- **Consent of the Data Subject**: only after express, free, specific, informed and unequivocal consent of the Data Subject, data may be processed for sending the newsletter and other relevant information concerning **GSKET**. A specific consent is also necessary for profiling purposes.
- **Fulfillment of contractual obligations**: the processing of data for this purpose is necessary for the execution of a binding agreement between **GSKET** and the Data Subject. The provision of personal data for this purpose is not mandatory, but if data are not provided the contract cannot be executed.
- **Legitimate interest of the Data Controller**: such as the development of GSKET's products and services, the growth of GSKET's business and the evaluation of the business relationship between the Data Controller and the Data Subject (i.e.: truthfulness of the data provided, solvency, etc.). The provision of data for this purpose is not mandatory, but if data are not provided the contract cannot be executed.
- **Legal obligations**: processing for this purpose is necessary for **GSKET** to fulfil any legal obligations. The data provided, will be processed in accordance with the applicable legislation and may involve storage and communication to the Authorities for accounting, tax or other obligations.

### **RECIPIENTS OF PERSONAL DATA**

Personal Data of the Data Subject may also be shared with other "**Recipients**":

- Individuals who *outsource* activities on behalf of the Data Controller (as Data Processors or autonomous Data Controllers), such as persons, companies or firms that provide assistance and consultancy to **GSKET**;
- Persons delegated to carry out technical maintenance activities (including electronic communications networks);

- Companies that deal with communication and marketing/reporting online activities (web agency);
- Persons and operators who interact within the company organization (such as software suppliers);
- Persons authorized by **GSKET** to process Personal Data and to carry out activities strictly related to the fulfilment of binding and confidential agreements (e.g. **GSKET** employees);
- Factoring companies, credit institutions, debt collection companies, lawyers, credit insurance companies, commercial companies;
- Persons and entities to whom it is mandatory to communicate personal data in order to comply with legal obligations and orders of authorities, or to prevent abuse and fraud.
- Insurance companies and credit card companies .

### **TRANSFER OF PERSONAL DATA**

Personal Data may be communicated to Italian and foreign companies (Data Processors), which may also proceed to transfer them to other countries, even outside the European Union. GSKET ensures that such transfers will be carried out in accordance with the rules of GDPR (Chapter V).

The entities to whom Personal Data are communicated will be designated as Data Processors. A complete list of Data Processors can be requested at the following address: [amministrazione@gsket.com](mailto:amministrazione@gsket.com).

### **METHOD OF PROCESSING**

The processing of Data is carried out through the following operations: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure and destruction of data.

The data will be processed in such a way in order to guarantee continuous security and confidentiality and may also be carried out by electronic and/or automated means.

The consistency of the collected Data will be will be evaluated from time to time, in order to avoid the processing of Data exceeding the purposes pursued in this privacy policy.

### **RETENTION OF PERSONAL DATA**

Personal Data processed for the purpose of "Contractual Compliance" will be kept for the time strictly necessary to achieve the aforementioned purpose.

Personal Data processed in compliance with contractual obligations, may be retained by **GSKET** for a longer period to prevent Customers from any liabilities.

Personal Data processed for the purpose of fulfilling legal obligations will be kept by **GSKET** for the relevant period in accordance with the applicable laws.

Personal Data processed to prevent Abuse/Fraud will be kept by the Data Controller for the period of time strictly necessary for the mentioned purpose.

Personal Data processed for marketing purposes and based on the user's consent, may be kept by the Data Controller until such consent is revoked and are verified every 24 months by the Data Controller.

## **LEGAL RIGHTS**

Data Subject has the right to:

- Request confirmation of the existence or non-existence of personal data concerning him/her, (even if not yet recorded), and therefore access to his/her Personal Data;
- Get reference to:
  - Origin of data collected;
  - Purposes and methods of processing;
  - Logic applied in case of automatic processing carried out by electronic means;
  - Identification details of the Data Controller, Data Processor and the their legal representatives in compliance with art.3, paragraph 1, GDPR;
  - Identification details of other subjects (or categories of subjects) who may have access to data
- Get: a) updating, rectification, integration of data; b) deletion, anonymization, blocking of Personal Data unlawfully processed or retained
- Request for the deletion of Personal Data or for limitation of processing;
- Exercise the right to data portability, i.e. to obtain in a structured, commonly used and machine-readable format a copy of your Personal Data provided or to request its transmission to another Data Controller;
- Oppose the processing of your Personal Data;
- Revoke his/her consent for marketing and profiling purposes;

The EU Regulation 679/2016 recognizes to the Data Subject the right to lodge a complaint with the Supervisory Authority (<http://www.garanteprivacy.it>).

Data Subject may also exercise his/her rights by writing to **GSKET** at the following address: [amministrazione@gsket.com](mailto:amministrazione@gsket.com).

## **Modifications**

**GSKET** reserves the right to modify and update this privacy policy, also with applicable laws.