

Dear customer,

Turin, May 18th, 2018

Privacy Policy pursuant to art. 13 of the UE Regulation 2016/679

Data Controller

We hereby inform you that, in compliance with Regulation EU 2016/679 (henceforth "**Regulation**"), your personal data will be processed by Gruppo Thema Progetti S.r.l., with headquarters in Via Giolitti 39 - 10123 - Turin, in its role as data controller ("**Controller**").

Types of processed data

The Controller will process your personal data (art. 4(1)), gathered in the context of the contract and/or to the purpose of the conclusion of the contract with the **Customer**. These data include, among others, your name, surname, mobile phone number, e-mail address and, in general, you contact data as contact person for the Customer.

Purposes, legal basis and optionality of the processing

Your personal data will be processed for the following **purposes**:

- a) Execution of the contract and/or pre-contract measures
The **legal basis** for the data processing is the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract (art. 6(1)(b) of the Regulation)
- b) Compliance with any legal obligations
The **legal basis** for the data processing is the compliance with a legal obligation to which the Controller is subject (art. 6(1)(c) of the Regulation)
- c) Control of reliability and solvency
The **legal basis** for the data processing is related to the achievement of the legitimate interests pursued by the Controller, aimed at the administrative and economic management control system (art. 6(1)(f) of the Regulation)
- d) Management of litigations
The **legal basis** for the data processing is related to the achievement of the legitimate interests pursued by the Controller, aimed at the defence of a right at administrative and judicial level (art. 6(1)(f) of the Regulation)

The provision of your personal data for the above-mentioned purposes is optional. However, if your data are not provided, the contract cannot be executed.

Your personal data will also be processed, without your specific consent, for the following purposes:

- e) Sending of promotional and advertising materials on products and services that are similar to those covered by the contract using your e-mail address, in compliance with the General Provision of the Italian Data Protection Officer (Garante per la Protezione dei Dati Personali) "Guidelines on promotional anti-spam activities" of July 4th, 2013.
The **legal basis** for the data processing is the performance of a contract to which the data subject is party (art. 6(1)(b) of the Regulation)

The provision of your personal data for the purposes under letter e) is optional. In case of denial to provide your data, there will not be any consequences.

Recipients and transfer of personal data

Your personal data may be shared with:

- Natural persons authorized by the Data Controller, subject to the previous signing of a confidentiality agreement (such as employees and system administrators);
- Consultants and credit institutions for accounting and administrative purposes; companies belonging to the Group; contracting firms in case of subcontracting of work (or part of it) to third party companies, some of which work as data processors (for a complete and updated list of the processors, please contact gtp@gtp.it)
- Subjects, entities or authorities to whom it is mandatory to transfer your personal data under law regulations or orders from the authorities.

The Data Controller will not transfer your personal data outside the European Economic Area.

Storage of personal data

Your personal data will only be stored for the time necessary for the purposes to which they are gathered, in compliance with the principle of data minimisation under art. 5, point 1 letter c) of the GDPR. In all cases, your personal data will be stored for the period of time that is necessary for the execution of the services covered by the contract. This is without prejudice to any further storage as required by the applicable legislation, including art. 2946 of the Italian Civil Code. Further information can be obtained from the Controller.

Your privacy rights, pursuant to art. 15 et seq. of the Regulation

You have the right to ask the Controller, at any moment, to access, rectify, or erase your data; to object to their processing or ask for a limitation of their processing; to receive the personal data concerning you in a structured, commonly used and machine-readable format in the cases under art. 20 of the Regulation. We also inform you that, pursuant to art. 21 of the Regulation, you have the right to object, for legitimate reasons, to the processing of your personal data at any time, initially or on the occasion of further communications on the topic.

All requests must be addressed in writing to the following address: gtp@gtp.it

You always have the right to lodge a complaint with a supervisory authority (Garante per la Protezione dei Dati Personali), pursuant to art. 77 of the Regulation, whenever you believe that your data have been processed in violation of the existing legislation.

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