

## **PRIVACY POLICY IN ACCORDANCE WITH EU REGULATION NO. 2016/679**

**JVC HOLDING Srl** headquartered at via Alessandrini n.14 a REZZATO (BS) - P.iva/c.f.01422760171, parent company of the companies **CESARE COLOSIO Srl** with registered office in via Alessandrini n.14 in REZZATO (BS), in its capacity as DATA CONTROLLER, (hereinafter, "Controller"), in accordance with art. 13 D.Lgs. 30.6.2003 n. 196 (hereinafter, "Privacy Code") and art. 13 EU Regulation n. 2016/679 (hereinafter, "GDPR") that Your data will be processed in the following ways and for the following purposes

### **1. Object of the processing**

The Data Controller processes the personal, identifying and non-sensitive data (in particular, first name, last name, tax code, VAT number, email, telephone number - hereinafter, "personal data" or also "data") communicated by You when registering to the Data Controller's website and/or when subscribing to the newsletter service offered by the Data Controller.

### **2. Purposes of the processing**

Your personal data are processed:

A) without Your express consent (art. 6 letter b, e GDPR), for the following Service Purposes:

- Fulfilling obligations required by law, regulation, EU legislation or an order of the Authority;
- To prevent or detect fraudulent activities or abuse harmful to the Website;
- exercise the rights of the Data Controller, such as the right to defense in court.

B) Only with Your specific and distinct consent (art. 7 GDPR), for the following Marketing Purposes:

- sending the contact form on the website [www.colosio.it](http://www.colosio.it)

Please note that if you are already our customer, we may send you commercial communications relating to services and products of the Owner similar to those you have already used, unless you disagree (art. 130 c. 4 Privacy Code).

### **3. Modalities of processing**

The processing of Your personal data is carried out by means of the operations indicated in art. 4 Privacy Code and art. 4 n. 2) GDPR and precisely: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your personal data is subject to both paper and electronic and/or automated processing.

The Data Controller will process your personal data for as long as necessary to fulfill the above purposes and in any case for no longer than 10 years after termination of the relationship for the Service Purposes and for no longer than 2 years after data collection for the Marketing Purposes.

### **4. Access to data**

Your data may be made accessible for the purposes set out in Article 2.A):

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- to employees and collaborators of the Data Controller or of the companies of the JVC HOLDING Srl Group of which the Data Controller is part, in their capacity as persons in charge and/or internal data processors and/or system administrators;

- to companies of the JVC HOLDING Srl Group of which the Owner is part (e.g., for support activities in the study of the feasibility of the customer's project, for technical management activities of the project, for the storage of personal data, etc.) or to third parties (e.g., providers for the management and maintenance of the website, suppliers, credit institutions, professional firms, etc.) who perform outsourcing activities on behalf of the Owner, in their capacity as external data processors.

### **5. Communication of data**

Without Your express consent (art. 6 lett. b) and c) GDPR), the Data Controller may communicate Your data for the purposes referred to in art. 2.A) to Supervisory Bodies, Judicial Authorities as well as to all other subjects to whom the communication is compulsory by law for the fulfillment of the said purposes. Your data will not be disseminated.

### **6. Data Transfer**

The management and storage of personal data will take place on servers located within the European Union of the Data Controller and/or third party companies appointed and duly appointed as Data Processors. Currently, the servers are located in Italy. The data will not be transferred outside the European Union. It is in any case understood that the Data Controller, should it become necessary, will have the right to move the location of the servers to Italy and/or the European Union and/or countries outside the EU. In this case, the Data Controller assures as of now that the transfer of the data outside the EU will take place in compliance with the applicable legal provisions by entering, if necessary, into agreements that guarantee an adequate level of protection and/or by adopting the standard contractual clauses provided by the European Commission.

### **7. Nature of data provision and consequences of refusal to respond**

The provision of data for the purposes of Article 2.A) is mandatory. Without them, we will not be able to guarantee you either registration to the site or the Services of art. 2.A).

On the other hand, the provision of data for the purposes of art. 2.B) is optional. You can therefore decide not to provide any data or to deny later the possibility of processing data already provided: in this case, you will not be able to receive newsletters, commercial communications and advertising material related to the Services offered by the Owner. In any case, you will continue to be entitled to the Services referred to in Article 2.A).

### **8. Rights of the data subject**

In Your capacity as a data subject, You have the rights under art. 7 Privacy Code and art. 15 GDPR and specifically the rights to:

- i. obtain confirmation of the existence or otherwise of personal data concerning you, even if not yet registered, and their communication in intelligible form;
- ii. obtain the indication of: a) the origin of the personal data; b) the purposes and methods of processing; c) the logic applied in case of processing carried out with the aid of electronic instruments; d) the identification details

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of the owner, managers and the representative appointed under Article 3, paragraph 1, GDPR; e) the subjects or categories of persons to whom the personal data may be communicated or who may become aware of them as appointed representative in the territory of the State, managers or agents;

iii. Obtain: a) the updating, rectification or, when you are interested, the integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including those that do not need to be kept for the purposes for which the data were collected or subsequently processed; c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;

iv. object, in whole or in part: a) for legitimate reasons to the processing of personal data concerning you, even if pertinent to the purpose of collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated calling systems without the intervention of an operator by email and/or through traditional marketing methods by telephone and/or paper mail. It should be noted that the data subject's right to object, set forth in point b) above, for direct marketing purposes through automated modalities extends to traditional ones and that, in any case, the possibility for the data subject to exercise the right to object even partially remains unaffected. Therefore, the data subject may decide to receive only communications by traditional means or only automated communications or neither type of communication.

Where applicable, you also have the rights under Articles 16-21 GDPR (Right to rectification, right to be forgotten, right to restrict processing, right to data portability, right to object), as well as the right to complain to the Data Protection Authority.

### 9. Methods of exercising rights

You may at any time exercise your rights by sending:

- a registered letter with return receipt to JVC HOLDING Srl with registered office in via Alessandrini n.14 a REZZATO (BS) - P.iva/c.f.01422760171;

### 10. Owner, manager and appointees

- a registered letter with return receipt to JVC HOLDING Srl with registered office in via Alessandrini n.14 a REZZATO (BS) - P.iva/c.f.01422760171;

The updated list of data processors and processors is kept at the registered office of the Data Controller.

I consent to the processing for what is provided in point 2B)  \_\_\_\_\_