

PRIVACY ORGANIZATIONAL MODEL GDPR "WEB VIRTUAL GUIDE" Page 1 di 4 INFORMATION Date 29/09/20 EX ART. 13 GDPR Revision 00

INFORMATION

Pursuant to Art. 13 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016

Pursuant to Art. 13 of the General Data Protection Regulation – Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR), Cereal Docks S.p.A. must provide the following information regarding the processing of your personal data provided to allow the relationship with Cereal Docks S.p.A.

Controller

The Data Controller is **Cereal Docks S.p.A.**, with registered office in Camisano Vicentino (VI) Via dell'Innovazione n. 1, tax code and registration number within the Vicenza Business Register: 02218040240 (hereinafter "**Controller**" or "**Company**").

Data Protection Officer (hereinafter "DPO")

The Controller makes use of the Group's DPO, appointed pursuant to Article 37(2) of the GDPR.

The DPO's contact details can be found on the Controller's website or at the Controller's registered office. To exercise your rights and for any communication, problem and/or request for clarification regarding the protection of your personal data, you may freely contact the DPO.

Mandatory monitoring for which the processing does not require consent

Purpose	Legal basis of the processing
Managing the data provided by filling in web forms within virtual guides con the Company's website. Managing data storage, sending information and communications, including electronic communications, requested by you through the Company's website, and sending documents regarding the relationship with the Company.	Art. 6, paragraph 1, letter (c), GDPR Processing is necessary to comply with legal obligations to which the Controller is subject; Art. 6, paragraph 1, letter (f), GDPR Processing is necessary for the purposes of the legitimate interests pursued by the Controller in relation to the organisational, administrative, financial and accounting management of its organisation.

Optional monitoring for which the processing requires consent

Purpose	Legal basis of the processing
Promotional and marketing activities with the provision of material and information on new products, promotions, discounts, benefits, and other services of interest related to your business, also by sending special material in paper and/or electronic form, by means of newsletters (e-mail, SMS, MMS, instant messaging); invitations to events organized or sponsored by the Company.	The data subject has given consent to the processing of his or her personal data for one or more specific purposes.
Carrying out market surveys and/or customer satisfaction surveys.	Art. 6, paragraph 1, letter (a), GDPR The data subject has given consent to the processing of his or her personal data for one or more specific purposes.



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Recipients of personal data

For the fulfillment of the purposes indicated above, your personal data may be communicated to:

- employees and/or collaborators of the Data Controller, duly appointed as authorized and trained subjects on the processing of such data;
- other companies of the Cereal Docks Group, for the management of specific functions and/or services;
- third parties other than the Controller, such as:

Third parties or categories	Purposes	Notes
IT companies.	Management, maintenance, updating of	
	systems and software used by the	
	Controller and video surveillance systems	
Providers of networks,	Hosting, housing, Cloud, SaaS, and other	Cloud Services may
electronic communication	remote IT services essential for the	involve data processing
services and computer and	provision of the activities of the	in non-EU countries
telematic services for the	Controller; filing and storage services of	which guarantee
storage and management of	electronic documents by law.	appropriate
computer data.		confidentiality rights.
Consultants, lawyers, law firms,	Judicial, extra-judicial, and accident	
arbitrators, insurance	insurance activities.	
companies, and brokers.	Organizational, administrative, financial,	
	and accounting management.	

Companies of the Cereal Docks Group and third parties to whom your personal data may be disclosed act as:

- Data controllers, i.e. subjects who determine the purposes and means of the processing of personal data;
- Data processors, i.e. subjects who process personal data on behalf of the Data Controller;
- Joint controllers of the treatment that determine the purposes and means of the treatment jointly with the Company.

The list and the updated information regarding the subjects identified as controllers, processors or joint controllers are available at the Company.

Period of retention of personal data

Below is explained the period of retention of personal data or, when impossible, the criteria used to determine such period.

Personal data and documents	Retention period or criteria for its determination
Personal data and documents relating to the relationship with the Company.	For the duration necessary to pursue the purposes of the processing and also subsequently, within the limits granted by law, for administrative and accounting purposes, as well as to assert or protect the rights of the Controller, where necessary.
Contact information for promotional purposes, marketing, newsletters, and invitations to events better detailed above.	For the duration necessary to pursue the purposes of the processing and, in any case not longer than 24 months
Market survey and/or customer satisfaction surveys.	For the duration necessary to pursue the purposes of the processing and, in any case, no longer than 24 months.



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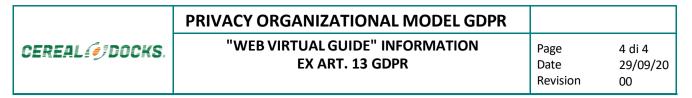
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Rights of the data subject

We inform you about the existence of certain rights provided for by GDPR with regard to personal data and related processing that you may request from the Controller.

Right	Description	Exercise procedures
Right of withdrawal of consent Art. 13, Paragraph 2, letter (c)	You have the right to withdraw consent for the processing operations for which consent is requested. The withdrawal of consent shall not affect the lawfulness of processing based on consent given before its withdrawal.	Forms available on the website or by the Controller.
Right of access to data Art. 15	You may request: (a) the purposes of the processing; (b) the categories of personal data concerned; (c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular, if they are recipients from third countries or international organizations; (d) where possible, the expected retention period for the personal data or, where that is not possible, the criteria used to determine that period; (e) the existence of the right of the data subject to request the controller to correct or erase the personal data or to restrict the processing of personal data concerning him or to object to their processing; (f) the right to lodge a complaint; (g) all available information on the origin of data, if they are not collected from the data subject; (h) the existence of an automated decision-making process, including profiling processes as referred to in Article 22 (1) and (4), and, at least in such cases, relevant information on the logic used and the importance of and the anticipated consequences of such processing for the data subject. You have the right to request a copy of the personal data being processed.	Forms available on the website or by the Controller.
Right of rectification art. 16)	You have the right to request the rectification of inaccurate personal data, and to obtain the integration of incomplete personal data.	Forms available on the website or by the Controller.
Right to be forgotten (art. 17)	You have the right to obtain the cancellation of your personal data by the Controller, if the personal data are no longer necessary to the purposes for which they were collected or processed.	Forms available on the website or by the Controller.
Right to restriction of processing (art. 18)	You have the right to obtain from the Data Controller restriction of processing when contesting the accuracy of the personal data (for the period necessary for the Data Controller to verify the accuracy of such personal data), or if the processing is unlawful, but you oppose the erasure of personal data and instead request that their use is restricted or if they are necessary for the establishment, exercise or defense of a right in court, while the Data Controller no longer needs them.	Forms available on the website or by the Controller.



Right to data portability (Article 20)	You have the right to receive your personal data in a structured format, commonly used and readable by automatic devices, and have the right to transmit them to another Controller if the treatment: (i) was consensual, (ii) based on a contract, and (iii) whether the processing is carried out by automated means, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority and such transmission does not infringe	Forms available on the website or by the Controller.
Right of pbject (art. 21)	the rights of a third party. You have the right at any time to object, in whole or in part, to the processing of your personal data if the processing is carried out for the pursuit of a legitimate interest of the Controller or if the processing is carried out for direct marketing purposes.	Forms available on the website or by the Controller.
Right to lodge a complaint with a Supervisory Authority (art. 77)	You have the right to complain to the Supervisory Authority if you consider that the processing of your data is in breach of the GDPR.	

The exercise of these rights is subject to the limits, rules and procedures laid down by the GDPR and which the data subject must know and implement. Furthermore, in accordance with article 12, paragraph 3, the Controller shall provide the daya subject with information on the action taken without undue delay and, in any case, no later than one month after receipt of the request. This period may be extended by two months, if necessary, taking into account the complexity and number of requests. The Data Controller shall inform the data subject of such extension, and of the reasons for the delay, within one month of receipt of the request.

Amendments and updates

This information may be subject to change and/or addition, also as a result of the applicability of the GDPR and any future changes and/or regulatory updates.

The updated information is constantly available on the website of the Controller

The personal data provided may be processed by the Data Controller with or without by computer tools. We also inform you that the communication of your personal data for the mandatory purposes indicated is a legal or contractual obligation or a necessary requirement for the performance of contractual obligations, so you have the obligation to provide personal data, otherwise, you will not be able to manage the relationship with the Company.