

Attn.

**INFORMATION RELATING TO THE PROCESSING OF PERSONAL DATA
OF CLIENTS AS ESTABLISHED BY AND IN ACCORDANCE
WITH ART. 13 OF GDPR 679/2016**

In accordance with provisions established by the GDPR 679/2016, as the "Data Subject" we hereby inform you how personal data relating to your person and/or your company will be collected and processed by us in the performing of the activity of Sales Agents and Temporary Export Manager (TEM) and/or with regard to company internationalisation, and to allow us to carry out these tasks appropriately and in compliance with currently enforced law.

We therefore provide below all pertinent information relating to the processing of personal data, as specified below:

1. IDENTITY AND CONTACT DETAILS FOR THE DATA CONTROLLER

The Data Controller is Tolot International Marketing and Sales of Tolot Paolo s.a.s., with offices in Padua, Italy in via Rari Nantes n. 12, VAT number 04721920280 , e-mail: paolo@tolot.it , pec: tolotims@ticertifica.it.

2. PURPOSE OF DATA PROCESSING

Subject to compliance with the obligations provided for by laws, regulations and EU provisions, the data collected will be processed for the purpose of enabling the following tasks to be undertaken:

- a) a correct management of agency activities, TEM and consultancy with regard to company internationalisation (i.e. identification of business clients and partners, outlining the characteristics of the products/services offered by the principal companies that we represent; direct mailing of business proposals aimed at soliciting orders; forwarding of orders placed by our principal companies, consultancy relating to Organisation of the business concern, Sales and Marketing focused on the export of goods and services);
- b) circulation of newsletters and/or other matter and/or advertising and promotional flyers relating to products, services or events linked to agency activities.

3. LAWFUL BASIS FOR DATA PROCESSING

The lawful basis for data processing is as follows:

- a) obtaining of consent from you on our initial contact;
- b) further to the setting up of a contractual relationship with our principal company, the signing of an agency or consultancy contract, in addition to contractual relations between you and/or our principal company;
- c) In reference to the specific marketing aims as per item 2b, the lawful basis of data processing is constituted by the giving of your specific consent.

4. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA

The personal data collected from you may be disclosed by us solely to the third parties listed below:

- a) principal companies for the purpose of transmitting orders that we receive from you;
- b) consultancies with regard to business internationalisation.
- c) External studios or legal offices should we be called upon to proceed with debt collection for the principal companies, or should we be required to proceed with debt collection on our own behalf from the principal companies, in relation to business conducted with you.

Your personal data may moreover be disclosed to subjects specifically appointed by the Data Controller to undertake operations related to the handling of these data for the purposes established above.

Specific data enabling the identification of the abovementioned third parties may be disclosed to you at any given time on exercising your acknowledged right to access, notwithstanding any legal limitations to this regard.

5. TRANSFER OF PERSONAL DATA BY THE DATA CONTROLLER TO A THIRD COUNTRY OR AN INTERNATIONAL ORGANISATION

The Data Controller does not intend to transfer the data collected to any third countries or to an international organisation.

6. STORAGE PERIOD OF THE PERSONAL DATA COLLECTED

The data collected will be stored as follows:

- a) Data required in the carrying out of our operations as sales agents: for the duration of these operations, i.e. in all events up until you withdraw your consent.
- b) Data required in managing relations with one or more principal companies: for the duration of the contractual relationship, i.e. of contractual relationships between you and the principal company or companies.
- c) Accountancy records, invoices and correspondence: ten years, as provided for by law.
- d) Data required to enable debt collection: up until termination of the operation.
- e) Data required for the management of any disputes: up until resolution of the dispute and/or subject to legal provisions relating to the exercising of all rights deriving from the relationship with the agency.
- f) Data required for consultancy activities: for the duration of the contractual relationships between your company and our principal company or companies, and in all events up until you withdraw your consent. In the absence of

commercial/contractual relationships, the data shall be processed and stored for a period of three years from the time of provision, subject to subsequent withdrawal.

Without prejudice to potentially longer periods of storage should these derive from obligations of a legal, financial or fiscal nature.

On completion of the storage period as described above, all information relating to you will be deleted.

7. RIGHTS OF THE DATA SUBJECT

The GDPR 679/2016 law acknowledges the following rights for the data subject:

- a) right to access the collected and processed data – art. 15;
- b) right to obtain the rectification of data – art. 16;
- c) right to obtain the erasure of data and right to be forgotten – art. 17;
- d) right to obtain the restriction of processing – art. 18;
- e) right to the portability of data to another data controller – art. 20;
- f) right to object to data processing – art. 21;
- g) right to not be subjected to automated processing – art. 22;
- h) right to withdraw consent at any time, without prejudice to the lawfulness of data processing based on the consent given prior to withdrawal – art. 7;
- i) right to lodge a complaint with a Supervisory Authority – art. 77;
- j) right to an effective judicial remedy against a Supervisory Authority (art. 78) or against a data controller or processor (art. 79).

To exercise the right listed in items a) to h) you should contact the Data Controller.

8. PROVISION OF DATA

The provision of personal data by the Data Subject, whilst not mandatory, is required for the achieving of the above-mentioned aims. Failure to provide these data will imply an impossibility to process your data and the termination of any business relations established previously.

The Data Subject should ensure the timely notification to the Data Controller of any changes to the personal data provided.

9. AUTOMATED DECISIONAL PROCESS AND PROFILING

The data provided shall not be subjected to processing by means of automated decisional processes or profiling.

10. METHODS OF PROCESSING

The data provided will be handled in accordance with provisions laid down by the GDPR 679/2016 and as follows:

- a) access to data and files will be permitted solely to the undersigned Paolo Tolot, as legal representative of Tolot International Marketing and Sales of Tolot Paolo s.a.s. and to other persons specifically appointed by our company to deal with data processing;
- b) appropriate measures shall be taken to protect the data and areas and these shall be systematically monitored;
- c) collection of data through direct contact with the Data Subject;
- d) registration and elaboration using both IT systems and manual files and supports;
- e) organisation of a prevalently automated, but also manual, filing system;
- f) verification and rectification of data subject to your request.

11. COMPLAINT TO THE SUPERVISORY AUTHORITY

The Data Subject has the right to complain to the Supervisory Authority in the case of a purported breach of data processing in accordance with GDPR 679/2016.

The competent Authority is the Italian Data Protection Authority (“Garante”)

<https://www.garanteprivacy.it/en/home/docweb/-/docweb-display/docweb/1665291>

Padua, May 25th 2018 _____

Paolo Tolot
Tolot International Marketing and Sales di Tolot Paolo s.a.s.