

Attn.  
**The Principal / Principal Company**

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**INFORMATION RELATING TO THE PROCESSING OF PERSONAL DATA  
OF THE PRINCIPAL/PRINCIPAL COMPANY  
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, 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](mailto:paolo@tolot.it) , pec: [tolotims@ticertifica.it](mailto: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 relationship;
- b) Compliance with legal and contractual obligations, including those deriving from Collective Economic agreements in the sector.

**3. LAWFUL BASIS FOR DATA PROCESSING**

The lawful basis for data processing, with regard to the established aims and purposes, is as follows:

- a) Compliance with legal and/or contractual obligations.

**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) accountant, tax advisor, lawyer, also in the context of any professional associations the agent adheres to;
- b) the Fondazione Enasarco, to comply with social security and welfare obligations;
- c) department of Revenue and Customs;
- d) clients and potential clients in the area in which the agent operates;
- e) providers, brokers and potential sub-agents of the principal and the agent.

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 to allow a contractual relationship to be conducted: for the duration of the contractual relationship with the agency, further to an additional five years following termination of the relationship for the purpose of complying with specific legal and/or contractual obligations.
- b) Accountancy records, invoices and correspondence: ten years, as provided for by law.
- c) Data required to enable debt collection: up until termination of the operation.
- d) 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.

Without prejudice to potentially longer periods of storage should these derive from obligations of a contractual, 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 data by the data subject is a mandatory requisite in establishing, managing and terminating an agency relationship. Failure to provide these data will imply the impossibility to undertake a contractual relationship. 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 the data and to files shall only be permitted to persons in charge of or authorized to process the same;
- 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 a request from the Data Subject.

## **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 25<sup>th</sup> 2018

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