

## INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF THE EU REGULATION 2016/679

The Data Controller would like to inform you about the processing of personal data necessary for the management of the contractual relationship. Personal data may also refer to employees and collaborators necessary for the correct management of the relationship.

### Data subjects

Customers and contact persons of customer companies.

### Data Controller

DocFlow Italia S.p.A. ubicate in Centro Direzionale Milanofiori, Strada 1 Palazzo F8 – 20057 Assago (MI), VAT IT11325150156, contact mail: [marketing@docflow.it](mailto:marketing@docflow.it)

### Data Protection Officer

According to Article 37 of the GDPR, the Data Controller has appointed a Data Protection Officer who can be contacted at the email address: [dpo@docflow.it](mailto:dpo@docflow.it)

### Purpose of data processing

your data will be processed for the following purposes based on the relevant legal bases:

n°	Purposes	Legal Bases
1	Sales agreement management.	Processing is necessary for the performance of a contract to which the data subject is a party. Art. 6 par. 1 letter b)
2	Quotation and offer management	Processing is necessary for the performance of a contract to which the data subject is party. Art. 6 par. 1 letter b)
3	Accounting and tax legislation obligations.	Processing is necessary for satisfying the legal obligation to which the controller is subject. Art. 6 par. 1 letter c)
4	Customer care and after sale services and Customer satisfaction detection.	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Art. 6 par. 1 letter f)
5	Litigation management and credit recovery activities.	Processing is necessary for the execution of a contract in which the controller is a party. Art. 6 par. 1 letter f)
6	Activities related to the maintenance of the Integrated Quality Management System	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Art. 6 par. 1 letter f)

<b>7</b>	Sending communications via e_mail to keep you updated about new product development, training/seminars, services and/or events organized by us.	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Art. 6 par. 1 letter f)
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In no way will an automated decision-making process (profiling) be applied to your personal data.

#### **Type of personal data processed:**

- Data relating to an identifier, such as a name, location, contact details, etc.;
- Data relating to the economic activities of the concerned party.

#### **Method of processing**

The personal data collected will be processed with:

- corporate IT systems and paper archives, in compliance with the Security Measures provided for by art. 32 of the GDPR;
- personal data will be processed by appointed persons in charge of processing appointed as pursuant to art. 29 of the GDPR.

#### **Data recipients**

Personal data might be disclosed to:

- Banks;
- Companies that provide digital preservation services in accordance with the law;
- Providers for DEM services and sending newsletter;
- Public and/or Private bodies to which communication is necessary for legal obligations;
- Professional advisors;
- Insurance companies;
- Debt collection company;
- Carriers, forwarders and logistics companies and post offices.

The above subjects have been expressly appointed as Data Processors pursuant to Art. 28 of the GDPR or as independent data controllers.

#### **Personal data disclosure**

Your personal data will not be disclosed.

#### **Transfers of personal data to third countries**

The personal data collected will be processed within European Union.

#### **Data retention**

Your personal data will be kept according to the following:

Finalità	Periodo di conservazione
<b>Fiscal accounting records</b>	Your data will be kept for 10 years, which is the time fiscal accounting records have to be kept. See the art. 2220 of the Italian Civil Code.

#### **Rights of the data subjects**

Pursuant to Article 15 et seq. of the GDPR, Data Subjects (the natural persons to whom the personal data refer) may, at any time, exercise their rights such as the right to access their personal data, to correct it, cancel it, restrict its use, transfer it or to object to its processing and withdraw the consent to use it.

For further information relating to the data subjects' rights, see the website [www.garanteprivacy.it](http://www.garanteprivacy.it)

Pursuant to art. 77 of the GDPR, the data subject can submit a notify or a complaint by contacting the Italian Data Protection Authority located in Piazza Venezia, 11 - 00186 Rome mail: [urp@gpdp.it](mailto:urp@gpdp.it)