Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)

This Privacy Notice describes the purposes and methods of processing the personal data of customers of **Refrind S.r.l. dei F.lli Bettini** (hereinafter referred to as "**Refrind**").

1) Data controller

The Data Controller is **Refrind S.r.l.**, with registered office at Via B. Colleoni No. 35/37, 24060 Gorlago (BG), Italy.
E-mail: info@refrind.com, Website: www.refrind.it, Tel.: +39 035 300474, Fax: +39 035 290425, VAT No.: 01976920163

2) Data Protection Officer (DPO)

Pursuant to Article 37 of Regulation (EU) 2016/679, **Refrind** has decided not to appoint a Data Protection Officer (DPO), as it is not a public authority or body and its core activities do not consist of large-scale regular and systematic monitoring of data subjects, including special categories of personal data referred to in Articles 9 and 10 of the GDPR.

3) Purposes, Legal Basis and Methods of Processing

The personal data collected and processed by Refrind relating to its customers shall be processed for the following purposes:
a) Purposes related to the performance and management of contractual and pre-contractual relationships between the parties;
b) Civil, tax and accounting purposes;
c) Compliance with obligations established by laws, regulations, European Union legislation or orders issued by competent authorities (including anti-money laundering requirements where applicable).

Only upon your specific and explicit consent, your personal data may also be processed for:

a) Marketing and promotional purposes, including the sending of newsletters regarding services offered, invitations to events and trade fairs, the preparation of company profiles, and the collection and publication of images, photographs and videos.
Personal data are processed using both automated and manual tools for the period strictly necessary to achieve the purposes for which they were collected. Appropriate technical and organisational measures are implemented to prevent loss of data, unlawful or incorrect use, and unauthorised access.

Processing activities are carried out at Refrind's premises and at the premises of service providers responsible for electronic data processing on behalf of the Company. Such processing is performed exclusively by duly authorised personnel acting under the authority of the Data Controller or by personnel assigned to occasional maintenance activities.

4) Categories of Personal Data and Recipients

Refrind collects personal data necessary for the provision of services under existing contractual relationships, including, but not limited to: company name; telephone number; E-mail address; tax code; VAT number; first name and surname; images, photographs and videos; any other data necessary for the provision of the services.
Personal data may be disclosed to:
Public Authorities for the performance of their institutional functions; Debt collection agencies; Insurance companies; Legal advisers and lawyers for assistance in contractual disputes; Potential customers where necessary to facilitate business agreements; Consulting firms, professionals and entities providing services to the Company; Accounting and tax consultants; Banks and financial institutions; Other entities, institutions, companies or professionals involved in activities connected with the services provided; Suppliers and subcontractors involved in the fulfilment of contractual obligations; Inspection and auditing bodies; Providers managing web-related services (website, social media channels and related communication activities); Commercial agents and distributors.
These recipients shall process personal data as independent Data Controllers where applicable.
Personal data shall not be disseminated, except for images and videos which may be published on the Company's website or social media channels, subject to the data subject's prior consent.

5) Nature of data provision

The provision of personal data for the purposes referred to in points (a), (b) and (c) above is mandatory. Failure to provide such data may prevent Refrind from establishing or performing the contractual relationship and supplying the requested services.
The provision of data for the purpose referred to in point (d) is entirely optional and refusal to provide consent shall not have any adverse consequences.

6) Transfers of Personal Data Outside the EU

The personal data covered by this Privacy Notice are not transferred outside the European Union.

7) Data Retention Period

Personal data processed for pre-contractual and contractual purposes shall be retained for the period necessary to fulfil the purposes for which they were collected and, subsequently, for as long as required to: comply with legal obligations; respond to requests from competent authorities; manage judicial and extrajudicial disputes; handle any claims for compensation.
Images and videos processed on the basis of consent shall be retained until such consent is withdrawn.

8) Rights of data subjects

Under Articles 15 to 22 of the GDPR, data subjects are entitled to exercise the following rights:

Art.15	**Right of access by the Data Subject** The data subject shall have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed and, where that is the case, access to the personal data and the following information: 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 recipients in third countries or international organisations; d) where possible, the envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period; e) the existence of the right to request from the Data Controller the rectification or erasure of personal data, or the restriction of processing of personal data concerning the data subject, or to object to such processing; f) the

	right to lodge a complaint with a supervisory authority; g) where the personal data are not collected from the data subject, any available information as to their source; h) the existence of automated decision-making, including profiling referred to in Article 22(1) and (4), and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.
Art.16	**Right to Rectification** The data subject shall have the right to obtain from the controller, without undue delay, the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement..
Art.17	**Right to Erasure ("Right to be Forgotten")** 1. 1The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase such personal data without undue delay where one of the following grounds applies: a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) the data subject withdraws consent on which the processing is based pursuant to Article 6(1)(a) or Article 9(2)(a), and where there is no other legal ground for the processing; c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2); d) the personal data have been unlawfully processed; e) the personal data must be erased for compliance with a legal obligation under Union law or Member State law to which the controller is subject; f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).
Art.18	**Right to Restriction of Processing** 1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies: a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; d) the data subject has objected to processing pursuant to Article 21(1), pending verification of whether the legitimate grounds of the controller override those of the data subject.
Art.19	**Notification Obligation Regarding Rectification, Erasure or Restriction of Processing** The controller shall communicate any rectification, erasure or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if requested by the data subject.
Art.20	**Right to Data Portability** 1.The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format, and shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data were provided. 2 .In exercising the right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.
Art.21	**Right to Object and Automated Individual Decision-Making** 1The data subject shall have the right to object, at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her, including profiling. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such marketing purposes, including profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
Art.22	**Automated Individual Decision-Making, Including Profiling** 1. The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her..

9) How to Exercise Your Rights

Requests concerning the exercise of the rights described above may be submitted at any time to the Data Controller without any formal requirements by sending an e-mail to: **sales@refrind.com**

10) Right to Lodge a Complaint

Data subjects have the right to lodge a complaint with the competent Supervisory Authority if they believe that the processing of their personal data infringes applicable data protection legislation.
In Italy, complaints may be addressed to:
Italian Data Protection Authority (Garante per la Protezione dei Dati Personali)
Piazza Venezia, 11, 00187 Rome, Italy, Fax: +39 06 69677 3785, Telephone: +39 06 696771, E-mail: garante@gpdp.it
PEC: protocollo@pec.gpdp.it

11) Source of Personal Data

Personal data are primarily collected directly from the data subject. Certain information may also be obtained from publicly available sources.

CONSENT TO THE PROCESSING OF PERSONAL DATA

The undersigned _____
with reference to the processing activities described in Section 3(d) of this Privacy Notice:

☐ CONSENTS

☐ DOES NOT CONSENT

to the processing of personal data for marketing and promotional purposes.

Signature _____

Place and date _____