
Information Notice on the Processing of Your Personal Data

Art. 13 GDPR – General Data Protection Regulation (EU/2016/679)

Dear Client,

As you are resident in a country belonging to the EEA, the processing of your personal data is subject to EU Regulation 2016/679 (“GDPR”). Pursuant to the above-mentioned legislation, we provide you with the following information.

Nature of the data processed: We process your personal identification and contact details, as well as fiscal and economic data. We do not process any data that qualifies as special categories of personal data (Article 9 GDPR) or data relating to criminal convictions and offences (Article 10 GDPR).

Purpose of processing, legal basis and data retention period: Your personal data will be processed for the entire duration of the contractual relationship for the following purposes:

- a) to perform contractual relationships, current or future, concerning the supply of our products;
- b) to comply with fiscal and accounting obligations provided for by laws, regulations, and EU legislation.

The legal basis for processing is the performance of contractual and pre-contractual obligations.

The retention period varies according to the purposes:

- for contractual management, data will be stored for the time necessary to comply with fiscal obligations under national legislation;
- for commercial communications based on corporate social responsibility or accountability principles, data will be processed for a period proportionate to the stated purposes.

The data subject may withdraw consent to such processing at any time.

Methods of processing: Data processing is carried out using tools and procedures that ensure security and confidentiality. Processing may be performed on paper or by automated electronic means capable of recording, managing, and transmitting data.

Obligation or option to provide data: For the purposes referred to in point (a), the provision of data is mandatory in order to fulfil legal obligations; failure to provide such data will make it impossible to establish or continue the contractual relationship, to the extent such data are necessary for its performance.

For the purposes referred to in point (b), the provision of data is optional. Refusal to provide such data will only prevent you from receiving communications on updates and initiatives promoted by us.

Access to your data: Your data may be made accessible, for the above purposes, to employees and collaborators of the Controller, in their capacity as persons authorised to process and/or system administrators; to third-party companies or other entities providing outsourced services on behalf of the Controller, in their capacity as Data Processors.

Disclosure and dissemination: Your data will not be disseminated to unspecified parties by means of making them available or consultable.

Your data may be communicated, within their respective competences, to public bodies and authorities, or to private entities, whenever such communication is required (or permitted by law, secondary legislation, or EU regulations), or necessary for compliance with legal obligations.

Data transfers: Management and storage of personal data take place on cloud servers located in Switzerland. Switzerland is recognised as providing an adequate level of data protection; therefore, such transfers are authorised.

The Controller guarantees that any transfer of data to non-EU countries that are not deemed adequate will take place in accordance with Chapter V GDPR (Article 46), by adopting Standard Contractual Clauses issued by the European Commission

Your rights: Pursuant to Articles 15–22 GDPR, you have specific rights. In particular, you may obtain confirmation as to whether or not personal data concerning you (and your representative(s)) exist, and receive communication of such data and the purposes of processing. You may also request the erasure, anonymisation, or restriction of data processed unlawfully, as well as the updating, rectification, or—where you have an interest—the integration of your data. You may object, on legitimate grounds, to the processing itself.

We kindly ask you to promptly notify the Controller of any changes to your personal data, so that we may comply with Article 16 GDPR, which requires collected data to be accurate and kept up to date.

If you believe that the processing of your personal data is carried out in violation of the GDPR or the Italian Privacy Code, you have the right to lodge a complaint with the Italian Data Protection Authority, using the contact information available on their website at www.garanteprivacy.it, or to bring the matter before the competent judicial authorities.

Representative of the Controller within the European Union: Where personal data are processed by a controller or processor not established in the European Union, such entity, pursuant to Article 27 GDPR, must designate in writing a Representative in the Union. The Representative’s main role is **to act on behalf of the controller or processor with respect to their obligations under the Regulation**, serving as the contact point for Supervisory Authorities and data subjects regarding all matters relating to processing.

The Representative of the Controller within the European Union is **Indo S.r.l.s.**, with registered office in Italy, contactable at the following e-mail address: dpo@indoconsulting.it.

The Data Controller is **SIP Swiss Industrial Promotion SA**, with its registered office at Strada Cantonale 171, 6534 San Vittore, Switzerland. Phone: +41 (0)91 820 10 44. Email: info@sipsa.ch

SIP Swiss Industrial Promotion SA
