

Information to contact persons working with customers (legal entity)

The management of the contractual relationship with clients who are legal persons necessarily involves the processing of personal data (identification, telephone numbers, email) relating to the persons with whom they come into contact. This information is therefore provided, pursuant to art. 13 GDPR 679/16 - "European Regulation on the Protection of Personal Data", to the natural persons who work with customers. Given the difficulty of making it directly available to the individuals concerned, the information is made available to them on the Data Controller's website, with a request to notify the individuals concerned.

Identity of the Data Controller

The Data Controller is TURBODEN S.p.A., in the person of its pro tempore legal representative, with registered office in via Cernaia 10 - 25124 Brescia. The Data Controller can be contacted at the above address.

Contact details of the DPO (Data Protection Officer)

The DPO can be reached at the Data Controller's offices, or contacted by e-mail at DPO@turboden.it.

Data source

The personal data processed are those provided by the Data Subjects on the occasion of:

- visits or telephone calls;
- direct contacts;
- receiving or sending offers;
- transmissions and transactions following the order.

Purpose of processing

The personal data of contact persons are processed in order to:

1. forwarding communications of various kinds and by various means of communication (telephone, mobile phone, sms, messaging app, email, fax, paper mail);
2. formulate requests or process requests and proposals received;
3. exchange information aimed to the execution of the contractual relationship, including pre- and post-contractual activities.

Legal basis of processing

The legal basis is the need to follow up pre-contractual, contractual and post-contractual obligations.

Data transfer

Under no circumstances does the Data Controller transfer personal data to third countries or international organisations. However, it reserves the possibility of using cloud services; in which case, the service providers will be selected from among those who provide adequate guarantees, as provided for in Article 46 GDPR 2016/679.

Data retention

The Data Controller shall retain and process personal data for the time necessary to fulfil the purposes indicated. In this case, the data of contact persons are updated in the event of a job change or termination of the relationship and kept together with any correspondence pertaining to the contractual relationship until the administrative statute of limitations expires and, for longer periods, in the event of litigation.

Data recipients

The personal data processed by the Data Controller are not disseminated, i.e. they are not disclosed to unspecified persons, in any possible form, including making them available or simply consulting them.

The data may be processed by employees, on the basis of their roles and duties, and by collaborators of the Data Controller for the pursuit of the purposes indicated above.

These subjects have been authorised to process the data and have received adequate operating instructions.

They may also be communicated, to the extent strictly necessary, to subjects who, for the purpose of processing your requests, must provide goods or perform services on behalf of the Owner, who have been designated as Data Processors.

Lastly, they may be communicated to parties entitled to access them by virtue of provisions of the law, regulations or Community legislation.

Rights of the Data Subjects

The Data Subjects may exercise at any time the rights provided for by the GDPR 2016/679, in particular:

- The right of access (art. 15): to request confirmation of the processing of your data and, if necessary, a copy of the personal data in our possession and to verify the lawfulness of the processing.
- The right of rectification (Art.16): to request the rectification of the personal data we hold on you. This allows you to have the incomplete or inaccurate data in our possession corrected, although it may be necessary to verify the accuracy of the new data you have provided.
- the right to erasure (Art. 17): requesting that we erase or remove your personal data if there are no valid reasons for continuing to process it or following the exercise of the right to object (see below), in the event of unlawful processing of your data or when we are required to erase your personal data to comply with applicable law. Please note, however, that we may not always be able to comply with your request for erasure due to specific legal obligations which will be communicated to you, if applicable, at the time of your request.
- the right to restriction of processing (art.18): requesting the suspension of the processing of your personal data in the following cases:
 - a) verification of the accuracy of the data;
 - b) in the event of unlawful use of the data but you do not want us to erase them;
 - c) if you request us to retain the data (which we do not need to retain) for the purpose of establishing, exercising or defending legal claims; or
 - d) if you have objected to our use of your data but we need to verify whether there are overriding legitimate reasons for using it.
- the right to portability (Art.20): request to transfer your data in an intelligible format to another entity indicated by you.
- the right to object to the processing of your personal data (Art. 21).
- the right to object to automated decision-making processes (Art. 22).

The Data Controller recalls in particular that any Data Subjects may exercise the right to object in the forms and ways provided for in Article 21 GDPR.

The Data Subjects may exercise his/her rights by writing to the Data Controller at the above address, or by email, specifying the subject of the request, the right he/she intends to exercise and attaching a photocopy of an identity document certifying the legitimacy of the request.

Complaints

The Data Subjects has the right to file a complaint with the supervisory authority of the state of residence.

Automated decision-making processes

The Data Controller does not process personal data using automated decision-making processes.