Information to newsletter subscribers

This information is provided, pursuant to art. 13 GDPR 2016/679 - "European Regulation on the Protection of Personal Data", to newsletter subscribers. The Data Controller can be contacted at the above address.

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 is provided directly by the Data Subjects when registering for the newsletter.

Purpose of processing
The data will be used to send electronic communications of informative and promotional nature to the Data Subjects, regarding the products and services offered, events and webinars organized by the Company.

Legal basis of the processing
The legal basis is constituted by the consent of the Data Subjects expressed through the free subscription to the newsletter.

Revocation of consent
With reference to Article 7 of the GDPR 2016/679, the Data Subjects may revoke at any time any consent given for the aforementioned purpose by following the opt-out procedure set out in the newsletters. Following the revocation of consent, the Data Controller will cease to send the newsletter to the Data Subjects.

Nature of data provision and consequences of refusal to provide data
The provision of data is optional but essential in order to send the newsletter to the person concerned. Refusal to provide the data therefore makes it impossible to subscribe to the newsletter.

Period of data retention
The data is stored until the person concerned unsubscribes from the newsletter.

Data recipients
The personal data processed by the 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 and collaborators of the Data Controller, on the basis of the roles and tasks performed and 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 must supply goods or perform services on behalf of the Controller, who have been designated as Data Processors.

By way of example, they may be communicated to:
- companies and professionals that provide management and maintenance services for the site and information services
Lastly, they may be communicated to parties entitled to access them by virtue of provisions of law, regulations and EU legislation.

**Data transfer**

Under no circumstances does the Data Controller transfer personal data to third countries or to 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.

**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 circumstances
  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 delete them;
  c) where you request the retention of 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 their rights by writing to the Data Controller at the above address, or by email, specifying the subject of the request, the right they intend to exercise and attaching a photocopy of an identity document attesting to the legitimacy of the request.

**Complaints**

The Data Subjects has the right to lodge 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.