

Personal data processing policy

Policy pursuant to article 13 of EU Regulation 2016/679 for the protection of personal data (GDPR)

Pursuant to article 13 of EU Regulation 2016/679 (hereinafter GDPR), Tuvia Italia S.p.A. (hereinafter Tuvia or the Controller) - with registered office in Via Quintiliano 27, 20138 Milan - as Controller of personal data processing, in the person of its legal representative pro tempore, hereby informs that the personal data provided by you will be processed by Tuvia manually or by electronic or automated, computerized or telematic means, with logics strictly related to the purposes listed below and, however, in order to ensure the security and confidentiality of data.

Purposes, legal basis and lawfulness of processing

Personal data is processed by the Data Controller pursuant to article 6 of the GDPR.

The following are the specific purposes of processing and the related legal bases:

Processing purposes	Legal basis of processing
Customer pre-qualification	Execution of a contract or execution of pre-contractual measures
Conduct of contracts related to the services offered by the Controller	Execution of a contract or execution of pre-contractual measures
Creation of customer registry	Execution of a contract or execution of pre-contractual measures
Service provision	Execution of a contract or execution of pre-contractual measures

Nature of conferment and consequences of refusal

The conferment of data is obligatory for the fulfilment of legal and/or contractual obligations.

Therefore, eventual refusal to confer obligatory data will result in the objective impossibility to pursue the processing purposes referred to in this Policy (paragraph "Purposes, legal basis and lawfulness of processing").

Categories of recipients of personal data

The personal data conferred and the data relating to the execution of the contractual relationship may be disclosed to third parties belonging to the following categories:

- a) companies of the group of belonging of the Controller (parent companies, subsidiaries, associated companies), employees or collaborators under any title of the Controller or of companies of the group of belonging of the Controller;
- b) public or private parties, individuals or legal entities that the Data Controller uses for the performance of the activities instrumental to the pursuit of the aforementioned purpose or to which the Data Controller is obliged to communicate the Data, pursuant to legal or contractual obligations.

The data will also be processed by Privacy Delegates, as well as by parties specifically authorized to processing by the Data Controller, pursuant to the GDPR.

Personal data processed by Tuvia will not be disseminated.

Non-EU transfers

For the pursuit of the processing purposes described above, the personal data provided may be transferred to the recipients indicated above in Italy and abroad.

In no case will your personal data be transferred outside the European Union.

Personal data retention period



The personal data processed by Tuvia will be stored at the registered office of the Controller for the time necessary to execute the contractual relationship, as well as for that required by civil, fiscal and regulatory provisions. Subsequently, the data will be archived until the term provided for by law with reference to the individual rights that can be applied. After said terms, your data will be anonymized or deleted, unless it is necessary to keep it for other and different purposes provided for by express provision of the law.

Below is the detail of the duration of the data retention period for the purposes described above, or the criteria used to determine said period:

Purposes	Categories of personal data	Maximum terms provided for cancellation
Customer pre-qualification	<ul style="list-style-type: none"> • Tax ID and/or VAT • Name, address or other personal identification elements (company name, first name, last name, place and date of birth, work address, private address, telephone number, fax number, e-mail address, certified e-mail address) • Data contained in the Chamber of Commerce, economic and financial data, financial statements, judicial data (bankruptcy, consensual procedures, ...) 	2 years from the closing of the contract, except in cases of litigation
Conduct of contracts related to the services offered by the Controller	<ul style="list-style-type: none"> • Tax ID and/or VAT • Name, address or other personal identification elements (company name, first name, last name, place and date of birth, work address, private address, telephone number, fax number, e-mail address, certified e-mail address) • Data contained in the Chamber of Commerce, economic and financial data, financial statements, judicial data (bankruptcy, consensual procedures, ...) 	2 years from the closing of the contract, except in cases of litigation
Creation of customer registry	<ul style="list-style-type: none"> • Tax ID and VAT • Name, address or other personal identification elements (company name, first name, last name, place and date of birth, work address, private address, telephone number, fax number, e-mail address, certified e-mail address) • Bank references for payments 	2 years from the closing of the contract, except in cases of litigation
Service provision	<ul style="list-style-type: none"> • Name, address or other personal identification elements 	2 years from the closing of the contract, except in cases of litigation



Automated decision-making process

For the pursuit of the processing purposes described above, no decision is made based solely on automated processing that produces legal effects concerning the parties concerned or that significantly affects them in a similar way.

Rights of the party concerned

Pursuant to and for the purposes of the GDPR, parties concerned are entitled to the following rights that they may exercise towards the Data Controller:

- a) right to obtain from the Data Controller confirmation of whether the processing of personal data concerning you is in progress and, in this case, obtain access to the personal data and information provided for by article 15 and in particular to those related to the processing purposes, to the categories of personal data in question, to the recipients or categories of recipients to whom the personal data has been or will be communicated, to the retention period, etc.;
- b) right to obtain, where inaccurate, the correction of personal data concerning you, as well as the integration of the same if they are considered incomplete, also in relation to the processing purposes (article 16);
- c) right to delete data ("right to be forgotten"), in one of the cases referred to in article 17;
- d) right to limitation of processing, in the cases provided for by article 18;
- e) right to opposition to processing pursuant to article 21;

These rights may be exercised upon request to be sent by:

- registered letter with return receipt to the Controller to the address Via Quintiliano 27, 20138 Milan
- e-mail to the e-mail address: privacy@it.tuviagroup.com

Lastly, it is recalled that parties concerned have the right to file a complaint with the Guarantor for the protection of personal data or with another supervisory authority pursuant to article 13, paragraph 2, letter d) of the GDPR.

Amendments to this Policy

This Policy may be amended. It is therefore advisable to consult the privacy section of the website www.tuviaitalia.com on a regular basis.

