



BARUFFALDI FRATELLI SRL

23834 Premana LC - ITALY
Sede Legale: via Risorgimento 84
Sede Operativa: via Giabbio sn
Tel. +39 0341890241/ Fax. +39 0341818779
info@baruffaldi-fratelli.com
baruffaldi-fratelli.com - threadnippersitaly.it

C.F./P.IVA 00707720132
N.iscr. al Registro Imprese Lecco 00707720132
REA LC-158582
PEC baruffaldifratellisnc@lamiaptec.it

PRIVACY POLICY FOR CUSTOMERS/SUPPLIERS

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

1. Data Controller

The Data Controller is BARUFFALDI FRATELLI SRL, with registered office in VIA RISORGIMENTO 84 23834 PREMANA LC ITALY, P. IVA/C.F. 00707720132

It can be contacted at the email address: info@baruffaldi-fratelli.com and telephone: +39 0341890241.

2 Object of the Processing

We inform you, pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the "*Protection of natural persons with regard to the processing of personal data and on the free movement of such data*" (hereinafter, also Regulation or GDPR) as well as of the other current legislation on privacy, that the personal data provided by you or otherwise acquired in the context of our activity may be processed, in compliance with the aforementioned legislation and the confidentiality obligations that inspire the activity of our company, and represent a legal obligation or a necessary requirement for the conclusion of a contract.

3. Type of data processed

As part of its manufacturing and commercial activities, The Data Controller processes:

- Identification data of the company / natural person (company name, first name, surname, address)
- Contact details (phone, mobile phone, email)
- Tax data (tax code, VAT number)
- Shipping and billing information
- Data relating to orders, purchases and services requested
- Payment information
- Any images or technical information necessary for estimates or processing

4. Purposes of the processing

Personal data are processed for:

- a) Management of requests for information, quotes and communications of various kinds and with different means of communication (telephone, mobile phone, WhatsApp messages, e-mail)
- b) Sale/purchase of products and management of orders
- c) Execution of artisanal/custom processing
- d) Shipping and delivery of products
- e) Administrative, accounting and tax obligations



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f) Recovery of any credits and, more generally, management of any disputes that may arise (complaints, returns...)

g) Management of official requests from Public or Judicial Authorities in the cases provided for by law

5. Legal basis of the processing

The data acquired for the achievement of the purposes indicated are processed lawfully as they are necessary for the execution of a contract to which the data subject is a party (as a customer or supplier of the Data Controller). The legal basis is the need to follow up on pre-contractual, contractual and post-contractual obligations, as well as to comply with legal obligations, regulations and orders of the Authorities to which the Data Controller is subject, in particular in administrative, accounting and tax matters.

6. Processing methods

The data will be processed using paper and computer tools suitable for guaranteeing security and confidentiality and may also be carried out through automated tools designed to store, manage and transmit the data themselves.

The methods of data processing may provide for the use of automatic tools suitable for linking the data also to the data of other subjects, based on qualitative, quantitative and temporal criteria, recurring or definable from time to time.

7. Data retention

Personal data will be stored for the duration of the contractual relationship and subsequently according to the times imposed by regulatory obligations and by law.

If we intend to further process your personal data for a purpose other than that for which it was collected, we will provide you with information about that different purpose and any other relevant information prior to such further processing.

8. Communication of data

In order to comply with the aforementioned purposes, we also inform you that the personal data acquired may be communicated to the workers who work for the Data Controller within the limits of their competences and in accordance with the instructions given to them.

They may also be communicated to the following external parties:

1. consultants, accountants, and legal advisors/lawyers who provide functional services for the purposes indicated above;
2. banking and insurance institutions that provide functional services for the purposes indicated above;
3. Judicial or administrative authorities, for the fulfilment of legal obligations.
4. IT and management service providers
5. Logistics providers, express couriers and freight forwarders we trust, and companies that manage tracking policies (email, sms)
6. Area representatives and/or commercial agents authorized by the Data Controller for the management of commercial relations (requests for quotes, orders, customer assistance and support)

These external parties will act as appointed Independent Data Processors (art.28 GDPR)

The data will not be released.



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9. Transfer of data outside the EU

Any transfers to non-EU countries will take place in compliance with the guarantees provided for by the GDPR.

10. Rights of the data subject

The data subject has the right to obtain from the Data Controller, in the cases provided for, access to his or her personal data (including purposes, processing methods, categories of recipients, storage time) and the rectification or erasure of the same or the limitation of the processing concerning him or her or to object to the processing (Articles 15-22 of the GDPR).

In particular, the data subject has the right to:

- access your personal data;
- request the correction of inaccurate data or the integration of incomplete data;
- obtain the erasure of data (right to be forgotten);
- obtain the limitation of processing;
- object to the processing of personal data;
- receive the data in a structured, commonly used and machine-readable format and transmit them to another controller (right to data portability).

Requests can be submitted by contacting the Data Controller at the addresses indicated in this policy.

The data subject also has the right to lodge a complaint with the competent supervisory authority, in Italy the Italian Data Protection Authority.

11. Nature of the provision of data

The provision of data is necessary to provide/purchase products and services; failure to provide it may prevent the establishment or continuation of the relationship.

Updated: 30/04/2022