

# Privacy policy

Information on the processing of personal data for the  
Contacts service provided pursuant to art.13  
Regulation (EU) 2016/679 ("GDPR")

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# 1 Data Controller and Protection Officer

The Controller is Bremec Italia s.r.l., with registered office in via Macina 68, 25014 Castenedolo (BS) Italy, in the person of its legal representative pro tempore.

To exercise your rights, listed in article 6 below, as well as for any other request relating to the same and/or to this Information, you can contact the Controller at the following addresses:

phone: (+39) 0305356839

e-mail: info@bremec.it

## 2 Personal data processed, purpose of processing and legal grounds

The Controller will process your personal identification and contact data (such as name, surname, email address, phone number) directly provided by you by completing the appropriate data collection form in the "Contacts" sections on the website of the Controller (www.bremec.it, the "Site") or in the appropriate contact sections of the landing pages of the same Site.

The Controller intends to process your personal data for the purposes of:

- (a) respond to your message or request for information; the legal grounds for this purpose is the legitimate interest of the Controller pursuant to Article 6, paragraph 1, letter f) of the GDPR to be identified in the reasonable expectation that the user expects his personal data to be processed by the Controller to respond to your contact request;
- (b) send you promotional communications regarding the services and products of the Controller and/or the companies of the Controller's Group and/or events from these organizations or contact you for market research via phone contact with an operator or via automated contact methods (e.g. automated email campaigns, SMS, automated phone contact, instant messaging, etc.); the legal grounds for the processing of data is the granting of your consent, pursuant to Article 6, paragraph 1, letter a), of the GDPR;
- (c) promotion and sale of "dedicated" products and services of the Controller and/or companies of the Controller's Group, specifically identified through customer profiling techniques aimed at analyzing and predicting information relating to their preferences, habits, consumption choices, also through the use of automated techniques or systems, also implemented through the enrichment of data with information acquired from third parties (enrichment). The legal grounds for this purpose is your consent pursuant to Article 6(1)(a) of the GDPR.

## 3 Nature of the provision, data retention time and processing methods

For the purposes referred to in the previous paragraph 2, letter (a), the provision of your personal data is mandatory for the purposes of formulating a response to your request, given that your possible refusal to provide such data will make it impossible for the Controller to respond to your message, responding to your request for information.

With reference to the purposes referred to in the previous paragraph 2 letters (b) and (c) the provision of your personal data is optional and your refusal to provide them would only make it impossible for the Controller to update you regarding its products, services and /or initiatives or to develop promotional initiatives towards you that are more in line with your profile.

The retention time of your personal data:

- for the purpose referred to in the previous paragraph 2, letter (a), will last for the time necessary to respond to each individual request for information and in any case for a period not exceeding 90 days starting from the collection of the data. Once the aforementioned deadline has passed or ongoing requests have been processed, your data will be destroyed or made anonymous;
- for the purposes referred to in the previous paragraph 2, letters (b) and (c), will continue for 1 year from the date of issuing the relevant consent or until you decide to revoke your consent;

The processing is carried out in compliance with the requirements of the GDPR, according to the principles of correctness,

lawfulness and transparency and protection of your rights described therein. Personal data is processed using IT, telematic and/or paper tools, as well as with the use of security measures aimed at guaranteeing the confidentiality of personal data and avoiding undue access by unauthorized parties.

The Controller does not carry out an automated decision-making process on your personal data, including the profiling referred to in Article 22, paragraphs 1 and 4 of the GDPR.

## 4 Data communication

For the pursuit of the purposes described in the previous paragraph 2, the personal data processed will be known to the employees, similar personnel and collaborators of the Controller, who will operate as subjects authorized to process personal data.

Furthermore, your personal data may be processed by third parties belonging, by way of example, to the following categories:

- IT system management technical support service providers, logistics providers, advertising agencies or other service providers;
- business partners;
- suppliers of external electronic platforms for sending communications;
- companies belonging to the Group to which the Controller belongs, for the performance of instrumental activities connected or supporting those of the Controller.
- The subjects belonging to the above categories operate, in some cases, as data controllers specifically appointed by the Controller in compliance with Article 28 GDPR, in other cases in total autonomy as separate data controllers, it being understood that, in this last case, the communication of your personal data to these independent data controllers would take place solely for the purposes of pursuing the purposes referred to in the previous paragraph 2.

The complete and updated list of subjects to whom your personal data may be communicated can be requested by contacting the Controller at the contact details indicated in paragraph 1 of the Information.

Your personal data will not be disclosed.

## 5 Transfer of personal data outside the European Union

The Controller does not intend to transfer your personal data outside the European Union.

If this circumstance become necessary for technical-organizational needs, such transfer will in any case be preceded by prior verification of the existence of the conditions of legitimacy and adequate guarantees prescribed by the articles. 44 et seq. of the GDPR. In this circumstance, you may request from the Controller information on the transfer of your personal data outside the European Union and obtain a copy of the protection measures adopted by making a specific request to the Controller via the contact details indicated in paragraph 1 of the Information.

## 6 Rights of interested parties

In relation to the processing described in this Information, as an interested party, you may, under the conditions established by the GDPR, exercise the rights established in the articles. 15 – 21 of the GDPR, in particular:

- right of access: right to obtain confirmation as to whether or not personal data concerning you is being processed and, if so, obtain access to your personal data - including a copy of the same - and communication, among others, of the information referred to in the art. 15 of the GDPR;
- right of rectification: right to obtain, without unjustified delay, the rectification of inaccurate personal data concerning you and/or the integration of incomplete personal data pursuant to art. 16 of the GDPR;

- right to cancellation (right to be forgotten): right to obtain, without unjustified delay, the cancellation of personal data concerning you, in the cases indicated in the art. 17 of the GDPR; the right to erasure does not apply to the extent that processing is necessary for the fulfillment of a legal obligation or for the performance of a task carried out in the public interest or for the establishment, exercise or defense of a right in court;
- right to limit processing: right to obtain the limitation of processing, in the cases indicated in the art. 18 of the GDPR;
- right to data portability: right to receive, in a structured format, commonly used and readable by an automatic device, the personal data concerning you provided to the Controller and the right to transmit them to another controller without impediments, if the processing is based on consent and is carried out by automated means, as indicated in the art. 20 of the GDPR. Furthermore, the right to have your personal data transmitted directly from the Controller to another controller if this is technically feasible;
- right of opposition: right to object to the processing of personal data concerning you, unless there are legitimate reasons for the Controller to continue processing, pursuant to art. 21 of the GDPR;
- right to revoke consent at any time without prejudice to the lawfulness of the processing based on the consent given before the revocation;
- right to lodge a complaint with the Guarantor for the protection of personal data, Piazza Venezia n. 11, 00187, Rome (RM).

The above rights may be exercised against the Controller by contacting the references indicated in the previous paragraph 1. The Controller will take care of your request and provide it, without unjustified delay and, in any case, at the latest within one month of receipt. of the same, information relating to the action taken regarding your request.

The exercise of your rights as an interested party is free pursuant to art. 12 of the GDPR. However, in the case of manifestly unfounded or excessive requests, also due to their repetitiveness, the Controller may charge you a reasonable fee, due to the administrative costs incurred to manage your request, or deny satisfaction of your request.

Finally, we inform you that the Controller may request further information necessary to confirm the identity of the interested party.

**The Controller**  
**Bremec Italia s.r.l.**