



INFORMATIVE
exart. 13 Reg. 679/2016 EU
for the purpose of subscribing to the *newsletter* via the site
www.pfb.it

Disclosures synthetic

Dear User,

the purpose of the privacy policy is to provide maximum transparency regarding the processing of information that you will provide us by giving your consent for the purpose of subscribing to our newsletter. PFBSrl with headquarters in Via Raimondo dalla Costa n. 690, Modena (MO), PI - CF n. PEC : pfbmodena@legalmail.it, email: privacy@pfb.it In compliance with the obligations deriving from national legislation (Legislative Decree 30 June 2003 n. 196, Code regarding the protection of personal data, and subsequent amendments) and European (European Regulation for the protection of personal data n. 679/2016, GDPR), 00158620369, as Data Controller, has prepared and updates this information in order to respect and protect your privacy, making every possible and proportionate effort not to damage the rights of users. PFBSrl has not currently appointed a Data Protection Officer. By giving your consent to subscribe to our newsletter, your contact details and in particular the email address, will be included in our mailing list for sending communications of commercial nature, which may also be selected based on the analysis of your browsing experience on our site and on the basis of the products that, in light of the same, we will consider to be of greatest interest to you. By subscribing to our newsletter, you express your interest and consent to receive commercial communications from PFBSrl regarding promotions, initiatives and news relating to the activity of the Data Controller. The processing of contact data for this purpose is based on your consent and, therefore, at any time you can revoke it by following the instructions at the bottom of the communications sent or by sending a specific request to that effect to the address privacy@pfb.it.

PFBSrl may make use of third parties who ensure adequate guarantees regarding data protection and who are appointed as data processors, in charge of or in any case authorized for the processing itself. Your personal data will not be disseminated.

In particular, we inform you that our newsletter is managed using the Sendinblue service, a marketing platform provided by Sendinblue, SAS. This supplier may use subcontractors based in countries outside the EU, including the United States, with the consequent possibility that the data are transferred outside the European Union to third parties to whom standard contractual clauses may be applied in relation to the processing of personal data registered in the Paris Commercial Register at number 498 019 298 and whose registered office is located at 55, rue d'Amsterdam, 75008 Paris

At any time you can freely exercise the *Suoi* rights in relation to personal data, that request access to personal data and correct or cancel them or limitation of the data relating to you or to object to their treatment, as well the right to portability. The complete text regarding the rights indicated (articles 15-22 and 34 Reg. 679/16 EU) is available in the privacy policy of our site. The complete text concerning *Suoi* rights in relation to personal data (art. 15-22 and 34 Reg. 679/17 EU) is available in the end of this disclosure. To exercise these rights, the send contact us at privacy@pfb.it. The protection of *Suoi* data is important to us, but if there is *riteness and happy / a*, we remind you that the right to submit a complaint to the Authority for the Protection of Personal Data.

If you would like more details regarding the processing of personal data, you will find a more detailed information below.

PFBSrl

Updated: December 2020

Extended information

Pursuant to and for the purposes of art. 13 of Reg. 679/16 / EU (hereinafter, for brevity "GDPR") and of the Code regarding the protection of personal data (Legislative Decree 196/2003) as compatible, PFBSrl, as owner of the data, provides the following information relative to the processing of *d ati* contact for subscribing to newsletters PFBSrl through the site www.pfb.it.

In relation to such data, the following is specified.

A) IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The data controller is:

PFBSrl

Via Raimondo dalla Costa n. 690, Modena (MO)

CF 00158620369, REA number MO-118019

PEC : pfbmodena@legalmail.it - email : privacy@pfb.it

B) THE PURPOSES AND METHODS OF THE PROCESSING TO WHICH THE DATA ARE INTENDED

The processing to which the personal data provided and / or requested by you will be subjected is aimed exclusively at sending you communications regarding general information, news, events, opportunities and initiatives for the owner's marketing purposes disseminated through the newsletter issued by the same to which you can subscribe your website www.pfb.it. By giving your consent, commercial communications such as may also be selected based on the analysis of your browsing experience on our site and on the basis of the products that, in light of the same, we will consider to be of your greatest interest.

The processing of personal data will be carried out through operations or series of operations, possibly also with the aid of computerized processes, through, according to the definition referred to in art. 4, par. 1, no. 2) of the GDPR, "*the registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of disposition, comparison or interconnection, limitation, cancellation or destruction*"; all within the limits and for the purposes described above.

It should be noted that "personal data" (defined by current legislation - art. 4, par. 1, n. 1 GDPR - as "*any information concerning an identified or identifiable natural person*") provided by you and / or requested by you and / or acquired, will be processed in paper form and / or by electronic, IT and / or telematic tools and, in any case, with strictly indispensable logic and methods in relation to the purposes of the processing. Profiling is excluded.

Adequate technical and organizational measures have been adopted by the data controller to prevent the destruction, modification, illicit or incorrect use, unauthorized disclosure or access, accidentally or illegally, to personal data transmitted, stored or however treated.

Your personal data will be stored and processed by the data controller in full compliance with the principles of correctness, lawfulness, transparency and protection of confidentiality, with logic strictly related to the purposes indicated in this information. In particular, we inform you that the treatment will take place in compliance with the security of the treatment as regulated by the GDPR (articles 25 and



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32-35) for whose assessment the interested party has proceeded to the so-called risk analysis, preparing measures deemed appropriate for this purpose. to the risks.

C) THE MANDATORY OR OPTIONAL NATURE OF THE DATA CONFERENCE

The transfer of your data for sonali is absolutely necessary to handle properly and fully to your request for registration in the newsletter sent by the site www.pfb.it .

Your refusal to provide data and / or the provision of incorrect and / or incomplete information will make it impossible for the owner to manage your request correctly and fully.

D) DURATION OF THE TREATMENT

The data provided for the purpose of subscribing to the newsletter will be processed until you express your will to withdraw from the related service. The cancellation of the newsletter can be requested at any time by following the instructions at the bottom to receive communications or by contacting the owner of the treatment at email [privacy @ pfb.it](mailto:privacy@pfb.it) .

E) THE SUBJECTS OR CATEGORIES OF SUBJECTS TO WHOM THE PERSONAL DATA MAY BE COMMUNICATED OR WHO MAY COME TO KNOW AS MANAGERS OR IN CHARGE, AND THE SCOPE OF DISCLOSURE OF THE SAME DATA

Your personal data will be processed exclusively by persons specifically appointed by the data controller as data processors and / or data processors; these subjects will process your data only if necessary in relation to the purpose of the provision and only in the context of carrying out the tasks assigned to them by the data controller.

Pursuant to art. 28 of EU Reg. 679/16, the Data Controller may use third parties who process data on his behalf and formally appointed by them as data processors. The complete and updated list of the designated data processors will be provided to you by the Data Controller at your simple request, by sending a communication to the addresses indicated in the introduction and / or to the email address privacy@pfb.it .

Pursuant to art. 29 of EU Reg. 679/16, the Data Controller may use anyone acting under his authority and / or the appointed manager: these subjects will be duly instructed.

In particular, we inform you that our newsletter is managed using the Sendinblue service , a marketing platform provided by Sendinblue, SAS registered with the Paris Business Register at number 498 019 298 and whose registered office is located in 55, rue d'Amsterdam, 75008 Paris, which can also use subcontractors based in countries outside the EU, including the United States, with the consequent possibility that the data are transferred outside the European Union towards third parties to whom standard contractual clauses may be applied.

For more information, also with regard to third party sub-processors , it is possible to consult the Agreement on the processing of personal data referred to in Annex 1 of the General Conditions of Use of Sendinblue Services by consulting the supplier's website: <https://it.sendinblue.com/legal/termsfuse/>

F) THE RIGHTS REFERRED TO IN REG. 679/16 / EU

At any time you can exercise the rights provided for by the EU Reg. 679/16 / EU, that is to ask for access to personal data and the correction or cancellation of the same or the limitation of the processing of data concerning you or to oppose their treatment, in addition to the right to portability. The complete text regarding the rights indicated (articles 15-22 and 34 Reg. 679/16 EU) is available at the bottom of this information . To exercise these rights, you can contact the Data Controller via the email address privacy@pfb.it

PFBSrl

Last updated: January 2021

**RIGHTS OF THE INTERESTED PARTY
REG. EU 679/2016 (extract)**

Article 15

Right of access by the interested party (C63, C64)

1 . The interested party has the right to obtain from the data controller confirmation as to whether or not personal data concerning him is being processed and, in this case, to obtain access to personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data in question;
- c) the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if they are recipients of third countries or international organizations;
- d) when possible, the retention period of the personal data provided or, if not possible, the criteria used to determine this period;
- e) the existence of the right of the interested party to ask the data controller to rectify or delete personal data or limit the processing of personal data concerning him or to oppose the processing;
- f) the right to lodge a complaint with a supervisory authority;
- g) if the data are not collected from the data subject, all available information on their origin;
- h) the existence of an automated decision-making process, including the profiling referred to in Article 22, paragraphs 1 and 4, and, at least in such cases, significant information concerning the individual.

2 . If personal data are transferred to a third country or to an international organization, the interested party has the right to be informed of the existence of adequate guarantees pursuant to Article 46 relating to the transfer.

3 . The data controller provides a copy of the personal data being processed. In case of further copies requested by the interested party, the data controller may charge a reasonable fee based on administrative costs. If the interested party submits the request by electronic means, and unless otherwise indicated by the interested party, the information is provided in a commonly used electronic format.

4 . The right to obtain a copy referred to in paragraph 3 must not affect the rights and freedoms of others.

Article 16

Right of rectification (C65)



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The interested party has the right to obtain from the data controller the correction of inaccurate personal data concerning him without undue delay. Taking into account the purposes of the processing, the interested party has the right to obtain the integration of incomplete personal data, also by providing an additional declaration.

Article 17

Right to erasure ("right to be forgotten") (C65, C66)

1. The data subject has the right to obtain from the data controller the cancellation of personal data concerning him without undue delay and the data controller is obliged to cancel the personal data without undue delay, if one of the following reasons exists:

- a) the personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;
- b) the interested party revokes the consent on which the processing is based in accordance with Article 6, paragraph 1, letter a), or Article 9, paragraph 2, letter a), and if there is no other legal basis for the processing;
- c) the interested party opposes the processing pursuant to Article 21, paragraph 1, and there is no legitimate overriding reason to proceed with the processing, or opposes the processing pursuant to Article 21, paragraph 2;
- d) the personal data have been unlawfully processed;
- e) personal data must be deleted to fulfill a legal obligation under Union law or the law of the Member State to which the data controller is subject;
- f) the personal data have been collected in relation to the offer of information society services referred to in Article 8, paragraph 1.

2. If the data controller has made personal data public and is obliged, pursuant to paragraph 1, to delete them, taking into account the available technology and the implementation costs, it adopts reasonable measures, including technical ones, to inform the data controllers that they are processing the personal data of the request of the interested party to delete any link, copy or reproduction of his personal data.

3. Paragraphs 1 and 2 do not apply to the extent that processing is necessary:

- a) to exercise the right to freedom of expression and information;
- b) for the fulfillment of a legal obligation that requires the processing provided for by the law of the Union or of the Member State to which the data controller is subject or for the performance of a task carried out in the public interest or in the exercise of public authority of which the data controller is invested;
- c) for reasons of public interest in the field of public health in accordance with Article 9 (2) (h) and (i) and Article 9 (3);
- d) for archiving purposes in the public interest, for scientific or historical research or for statistical purposes in accordance with Article 89 (1), insofar as the right referred to in paragraph 1 is likely to render impossible or seriously prejudice the achievement of the objectives of this treatment; or
- e) for the assessment, exercise or defense of a right in court.

Article 18

Right to restriction of processing (C67)

1. The interested party has the right to obtain from the data controller the limitation of the processing when one of the following hypotheses occurs:

- a) the data subject disputes the accuracy of the personal data, for the period necessary for the data controller to verify the accuracy of such personal data;
- b) the processing is unlawful and the interested party opposes the cancellation of personal data and requests instead that its use be limited;
- c) although the data controller no longer needs it for processing purposes, the personal data are necessary for the data subject to ascertain, exercise or defend a right in court;
- d) the interested party opposed the processing pursuant to Article 21, paragraph 1, pending verification of the possible prevalence of the legitimate reasons of the data controller with respect to those of the interested party.

2. If the processing is limited pursuant to paragraph 1, such personal data are processed, except for storage, only with the consent of the interested party or for the ascertainment, exercise or defense of a right in court or for protect the rights of another natural or legal person or for reasons of significant public interest of the Union or of a Member State.

3. The interested party who has obtained the processing limitation pursuant to paragraph 1 is informed by the data controller before said limitation is revoked.

Article 19

Obligation to notify in case of rectification or cancellation of personal data or limitation of processing (C31)

The data controller communicates to each of the recipients to whom the personal data have been transmitted any corrections or cancellations or limitations of the processing carried out pursuant to Article 16, Article 17, paragraph 1 and Article 18, unless this is the case proves impossible or involves a disproportionate effort. The data controller informs the data subject of these recipients if the data subject requests it.

Article 20

Right to data portability (C68)

1. The interested party has the right to receive in a structured format, commonly used and readable by an automatic device, the personal data concerning him provided to a data controller and has the right to transmit such data to another data controller without impediments from part of the data controller to whom he provided them if:

- a) the processing is based on consent pursuant to Article 6, paragraph 1, letter a) or Article 9, paragraph 2, letter a) or on a contract pursuant to Article 6, paragraph 1, letter b); is
- b) the processing is carried out by automated means.

2. In exercising their rights regarding data portability pursuant to paragraph 1, the interested party has the right to obtain the direct transmission of personal data from one data controller to another, if technically feasible.

3. The exercise of the right referred to in paragraph 1 of this article is without prejudice to article 17. This right does not apply to the processing necessary for the performance of a task in the public interest or connected to the exercise of public authority vested in it. the data controller.

4. The right referred to in paragraph 1 must not affect the rights and freedoms of others.

Article 21

Right to object (C69, C70)

1. The interested party has the right to object at any time, for reasons connected to his particular situation, to the processing of personal data concerning him pursuant to article 6, paragraph 1, letters e) or f), including profiling on the basis of these provisions. The data controller refrains from further processing personal data unless he demonstrates the existence of compelling legitimate reasons for proceeding with the processing that prevail over the interests, rights and freedoms of the data subject or for ascertaining, exercising or the defense of a right in court.

2. If personal data are processed for direct marketing purposes, the interested party has the right to object at any time to the processing of personal data concerning him for these purposes, including profiling to the extent that it is connected to such direct marketing.

3. If the data subject objects to the processing for direct marketing purposes, the personal data are no longer processed for these purposes.

4. The right referred to in paragraphs 1 and 2 is explicitly brought to the attention of the interested party and is presented clearly and separately from any other information at the latest at the time of the first communication with the interested party.

5. In the context of the use of information society services and without prejudice to Directive 2002/58 / EC, the interested party can exercise his right to object by automated means using specific techniques.

6. If personal data are processed for scientific or historical research purposes or for statistical purposes pursuant to Article 89, paragraph 1, the interested party, for reasons connected with his particular situation, has the right to object to the processing of personal data that concerns, except if the processing is necessary for the performance of a task in the public interest.



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Article 22

Automated decision-making process relating to natural persons, including profiling (C71, C72)

- 1 . The interested party has the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or which significantly affects his person in a similar way.
- 2 . Paragraph 1 does not apply if the decision:
 - a) it is necessary for the conclusion or execution of a contract between the data subject and a data controller;
 - b) is authorized by the law of the Union or of the Member State to which the data controller is subject, which also specifies adequate measures to protect the rights, freedoms and legitimate interests of the data subject;
 - c) is based on the explicit consent of the interested party.
- 3 . In the cases referred to in paragraph 2 , letters a) and c), the data controller implements appropriate measures to protect the rights, freedoms and legitimate interests of the data subject, at least the right to obtain human intervention by the data controller. , to express their opinion and to contest the decision.
- 4 . The decisions referred to in paragraph 2 shall not be based on the special categories of personal data referred to in Article 9 (1), unless Article 9 (2) (a) or (g) applies and adequate measures are in place to protect the rights, freedoms and legitimate interests of the data subject.

Article 34

Communication of a personal data breach to the data subject (C68-C88)

- 1 . When the violation of personal data is likely to present a high risk for the rights and freedoms of individuals, the data controller communicates the violation to the data subject without undue delay.
- 2 . The communication to the data subject referred to in paragraph 1 of this article describes in simple and clear language the nature of the personal data breach and contains at least the information and measures referred to in article 33, paragraph 3, letters b), c) and d).
- 3 . Notification to the data subject referred to in paragraph 1 is not required if one of the following conditions is met:
 - a) the data controller has put in place the appropriate technical and organizational protection measures and these measures had been applied to the personal data subject to the violation, in particular those intended to make personal data incomprehensible to anyone not authorized to access it, such as encryption;
 - b) the data controller has subsequently adopted measures to avoid the occurrence of a high risk for the rights and freedoms of the data subjects referred to in paragraph 1;
 - c) such communication would require disproportionate efforts. In this case, instead, a public communication or a similar measure is carried out, through which the interested parties are informed with similar effectiveness.
- 4 . In the event that the data controller has not yet communicated the personal data breach to the data subject, the supervisory authority may request, after assessing the probability that the personal data breach presents a high risk, that it does so or decide that one of the conditions in paragraph 3 is met.

To exercise the rights indicated above, or to send communications and / or requests in relation to the processing of personal data, you can contact PFBSrl at the following email address : privacy@pfb.it