



GT Line srl - Via del Lavoro, 9 - Loc. Crespellano - 40053 Valsamoggia (Bo) Italy - Tel. +39 051 65041 - Fax +39 051 734925
www.gtline.com - e-mail: sales@gtline.com - salesinternational@gtline.com - vendite@gtline.com
Cap. Soc. 1.500.000 Euro i.v. - R.E.A. 336118 - M. BO 008491 - C.F. 04067070377 - Reg. Imp. Bo 04067070377 - P. IVA IT 00696831205

General information

on processing of personal data

Information on processing of personal data prepared in accordance with Regulation (EU) 679/2016 (GDPR), as implemented by Legislative Decree 101/2018

v 2.0



1. DATA CONTROLLER

The **Data Controller** in charge of processing is **GT LINE Srl** (VAT no. 00696831205), legally represented by Gian Paolo Tonelli, with registered office at Via del Lavoro 9, Località Crespellano, 40053 Valsamoggia (BO) (hereafter “**GTLine**” or the “**Controller**”).

You can contact the Controller by writing to its registered office or sending an e-mail to privacy@gtline.com.

2. PURPOSE OF PROCESSING

The Controller processes the personal data¹ of the subject² for the following purposes:

- a) Carrying out services as part of a contract (commercial and/or professional) with third parties or pre-contractual measures requested by the latter.
- b) Accounting, tax, pension and work requirements or other legal regulations.
- c) Adopting measures for information, security and protection for access to the headquarters and industrial sites.
- d) Adopting measures to guarantee the business can continue running and the requirements of the management system are met.

It is also for the following purposes:

- e) pre- and post-sales assistance to third parties
- f) collecting images and videos in order to carry out GTLine's business operations (projects, events, trade fairs, communication, promotion, etc.)
- g) communication, in whatever form, used to organize GTLine events (whether open to the public, by subscription or by invitation) and participation in them
- h) providing updates and information on GTLine's products and services, through mailing, magazines and newsletters
- i) communication and promotion for the above purposes, through social media,³ , including using images and video
- j) monitoring and profiling commercial clients
- k) managing and searching for job and work applicants

3. CATEGORIES OF PERSONAL DATA PROCESSED

The Controller processes shared personal data for the purposes listed in point 2.

In some cases it may be necessary for the Controller to process certain categories of data.

4. METHOD OF DATA PROVISION

Provision of data for the purposes in point 2, letters a) to d), is necessary if the services agreed in the contract are to be provided.



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Provision of data for the purposes in point 2, letters e) to k), is optional and processed by the Controller based on the Subject's consent or the explicit approval of this document.

5. CONSEQUENCES OF REFUSING TO PROVIDE DATA

Bearing in mind the above purposes of processing, if data is missing, partial or inaccurate, it may be impossible to carry out the activities described and the Controller will not be able fulfil the requirements. If it is necessary to process particular categories of data or judicial data⁴ in relation to the purposes in point 2, letters a) to d), the appropriate consent will be requested.

6. LEGAL BASIS FOR PROCESSING

Regarding the purposes in point 2, letters a) to d), processing is necessary for carrying out contracts that the Subject is party to and pre-contractual measures adopted at the Subject's request. The legal basis of this processing will be the need to: fulfil legal obligations; ascertain, exercise and defend legal rights; exercise judicial functions; and pursue the Controller's legitimate interests. In the latter case, processing will be carried out when there is no interest, right or fundamental liberty on the Subject's part.

For the processing in point 2, letters e) to k), and for the treatment of particular categories of data in all cases, the legal basis of the processing is based on express consent.

The legal basis of the potential processing of legal data for the purposes in point 2, letters a) to d), is the need to fulfil obligations and exercise rights expressly stated in legislation or regulations.

7. LENGTH OF PROCESSING

The data will be kept for the entire length of the contractual relationship. When this period ends, for whatever reason, the data will be kept for the length of the terms of limitation pursuant to law.

Regarding the purposes in point 2, letters e) to k), without prejudice to the right to revoke the contract at any time, the data will be kept for the duration of the contractual relationship and for no more than two years after the end of it or final contact with the Subject. Shorter terms can be decided for specific processing for which detailed information is provided.

8. REVOKING THE CONTRACT

For the above purposes and in cases where the legal basis is consent, it will be possible at any time to exercise the right to revoke consent, assuming consent was given in compliance with the GDPR, using the contact details given in this document. This will make it impossible for the Controller to continue using the personal data for the stated purposes, without prejudice to the lawfulness of the processing based on consent prior to revocation.



9. METHOD OF PROCESSING

Personal data will be processed on paper and using computers and other digital technology, or through the methods listed in article 4, no. 2, of the GDPR, which are designed to guarantee security and privacy, in compliance with article 32 of the GDPR.

10. PARTIES THAT MAY BE GIVEN OR BECOME AWARE OF PERSONAL DATA

For the purposes in point 2, the Controller may need to give your personal data to the following third parties:

- 10.1. supervisory and monitoring bodies and public and private bodies in general
- 10.2. parties that carry out administrative, commercial, legal, tax and pension work for the Controller
- 10.3. parties that provide services for management, functioning and maintenance of the Controller's IT system
- 10.4. international organization or parties that carry out their activities in countries outside the EU

The above parties work in some cases in total autonomy, as individual data processors, and in some cases as data processors appointed specifically by GTLine.

For the purposes in point 2, personal data is processed by and known to people authorized to process it, based on the different responsibilities assigned to them and instructions they receive.

The list of authorized data processors is made available by the Controller for consultation. It can be requested using the appropriate details.

The personal data processed by the Controller will be given to legitimate parties based on existing contractual relationships, with respect for existing legislation.

11. SPREADING DATA ABROAD

11.1. The management and storage of personal data will be carried out on servers located within the European Union, which belong to the Data Controller or to third-party companies duly appointed by the Controller. For some limited common personal data, there will be also the possibility to carry out their management and storage on servers located outside the European Union, in countries for which there may be or not an adequacy decision by the European Commission. In such cases, the Controller will always refer to the "standard clauses" art. 46 paragraph 2 lett. c) GDPR, after having evaluated the specific context of the of the transferred data destination country.

11.2. Where, not being available an adequacy decision by the European Commission, the Controller notices that the data destination countries, including the United States (USA), don't guarantee an adequate level of protection for personal data, the transfer of such data



will be made according to the following provisions of art. 49 GDPR:

- lett. a) the Interested Party has expressly consented to the data transfer proposal, after having been informed of the possible risks of such transfers due to the lack of an adequacy decision and adequate guarantees;
- lett. b) the transfer is necessary for the execution of a contract between the Interested Party and the Data Controller or for the implementing of pre-contractual measures required by the Interested Party.

The data transfer to countries that don't ensure an adequate protection level implies that the political and legislative system of that country isn't totally compatible with the fundamental rights recognized by the EU and that the local and government authorities of that country can access the data, mainly for reasons of national security.

- 11.3. With reference to point 5.2 lett. a), the data transfer outside the European Union requires the consent of the Interested Party. Failure to give consent could prevent the pursuit of the processing purposes referred to in point 2.

12. RIGHTS OF THE SUBJECT

Beyond what has already been stated in point 8 and in relation to data processing in point 2, using the contact details of the Controller in this document, the Subject can exercise the rights explicitly set out in article 15 *et seq.* of the GDPR against the Controller, including:

- i. Obtaining confirmation of the existence or non-existence of personal data that concerns the subject, even if not yet registered, and spreading it in an comprehensible way.
- ii. Obtaining information on: a) the origin of the personal data; b) the purposes and methods of processing; c) the logic applied in case of processing done using electronic tools; d) the identification details of the Controller and the individuals appointed as processors pursuant to article 3, paragraph 1, of the GDPR; or e) parties and types of parties that may be give or become aware of the personal data in their roles.
- iii. Requesting and ascertaining – where the legal basis is a contract or consent – that the data is spread in a structured, comprehensible form on an automatic device, including in order to give the data to a new processor (the "right to portability").
- iv. Obtaining: a) updating, correction and, where relevant, integration of the data; b) cancellation (the "right to be forgotten"), conversion into an anonymous form or blocking of data processed unlawfully, including data which does not need to be kept for the purposes for which it was gathered and then processed; c) assurance that the parties to whom the data has been spread are made aware of the operations in letters a) and b), including their content, except in cases where it is impossible to do so or leads to use of means that are clearly disproportionate to the rights granted.
- v. Proceeding by: a) opposing pressing of the personal data, in whole or in part, for legal reasons, even where relevant to the purposes of collection; b) asking to be informed if there



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is a decision process on advertising material, market research or commercial communication. If opposition to the processing is sent to the address provided at the end of this document, personal data will no longer be processed except to the extent allowed by law and relevant regulations.

- vi. Limiting data processing, or allowing processing within the bounds of storing the data, to ascertain, exercise or defend a judicial right or to protect the rights of another natural or legal person, or for reasons of public interest within the EU or a member state, in the cases described in the GDPR (a. the Subject contests the accuracy of the personal data, for the period needed by the Controller to verify the accuracy of the personal data; b. the processing is unlawful and the Subject is opposed to cancelling their personal data, instead asking that their use be limited; c. the Subject needs the personal data to ascertain, exercise or defend a right in a judicial setting; or d. the Subject has opposed the processing and expects a confirmation of the Controller's reasons for processing compared with those of the subject).
- vii. Finally, the Subject has the right to complain to the competition law authority, by:
 - addressing a registered letter to “Garante per la Protezione dei Dati Personali”, Piazza di Monte Citorio, 121 - 00186 Roma
 - sending an e-mail to garante@gpdp.it or protocollo@pec.gpdp.it, or a fax to +39 06 69677 3785

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¹Personal Data is understood as any information on a natural person (identified or identifiable), referred to as the "Subject", for example, name, identification number, residence, online profile, physical characteristics and appearance, genetics, character, financial status, and cultural and social background.

²The "Subject" is the natural person (identified or identifiable) that the personal data refer to.

³Social media means Facebook, Twitter, Instagram, YouTube and similar platforms

⁴Judicial data refers to personal data relating to criminal convictions, offences and related security measures.