

INFORMATION REGARDING THE PROCESSING OF CUSTOMER AND LEAD PERSONAL DATA PURSUANT TO REGULATION (EU) 2016/679 ("GDPR")

•	DATA CONTROLLER	GEWISS S.p.A. Via A. Volta, 1, 24069 Cenate Sotto Bergamo telephone number: +39 035 946111 e-mail address: privacy@gewiss.com ("Company")	
Ť	DATA PROTECTION OFFICER (DPO)	The DPO may be contacted at the following email address: dpo@pec.gewiss.com	



PERSONAL DATA PROCESSED

By way of example, "Data" refers to: first name, last name, residence, date of birth, VAT no./tax code, telephone numbers, email address, professional category, job title. In response to the social login, social networks will communicate the following data to Gewiss: name, last name, e-mail and (if necessary) profile image.

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PURPOSES OF THE PROCESSING	LEGAL BASIS FOR THE PROCESSING	DATA RETENTION PERIOD			
Creation of Company CRM personal data.	Execution of a contract or pre- contractual measures pursuant to Art. 6, paragraph 1, letter b) GDPR	Until cancellation request from CRM.			
If you are registering in the MyGewiss section, create a special account to use the services offered by the Company.	Execution of a contract or pre- contractual measures pursuant to Art. 6, paragraph 1, letter b) GDPR	Until the request for cancellation of the account.			
Send, by e-mail, informational communications ("Newsletters) to those who make explicit requests by entering their email address in the appropriate data collection form.	Execution of a contract or pre- contractual measures pursuant to Art. 6, paragraph 1, letter b) GDPR	The data collected will be stored until you ask to unsubscribe from the newsletter service.			
Marketing purposes: by way of example, sending – with automated	Consent (optional and revocable at any time).	Personal details: until withdrawal of consent			
contact methods (such as sms,mms, e-mail, social account) and traditional methods (such as telephone calls with operator and traditional mail) – promotional and commercial communications relating to services/products offered by the Company or invitation to/reporting of company events or participation /sponsorship /co-marketing of the company, as well as carrying out market studies and statistical analyses; sending of advertising of online services.		Marketing activity data: 24 months			
Profiling purposes : analysis of your preferences, habits, behaviours or interests in order to send you	Consent (optional and revocable at any time).	Personal details: until withdrawal of consent Data related to profiling performed:			
personalised commercial communications.		12 months			
Third-parties marketing purposes: communication /transfer of your data to third parties for commercial and marketing purposes of the latter.	Consent (optional and revocable at any time).	Until withdrawal of consent			
Third-parties profiling purposes: communication /transfer of your data for the analysis, by third parties, of your preferences, habits, behaviors or interests in order to send you	Consent (optional and revocable at any time).	Until withdrawal of consent			



personalised commercial communications based on your preferences and interests in relation to the products and services used.		
Fulfillment of obligations set forth by applicable national and supranational regulations and regulations.	Fulfilment of legal obligations	Contract term and, after termination, 10 years.
If necessary, to ascertain, exercise or defend the rights of the Data Controller in court and/or out of court.	Legitimate interest (legal protection of the Data Controller)	In the event of judicial and/or extrajudicial disputes, for the entire duration of those disputes, until the terms for the enforceability of the appeal actions are exhausted.

Once the storage terms indicated above have passed, the Data will be destroyed, deleted or anonymised, in accordance with the technical procedures for deletion and backup and with the accountability needs of the data controller. In particular, following your possible withdrawal of consent, the Company will continue to process your Data in order to be able to obtain evidence of the fact that marketing information and promotional material must no longer be sent to you and that profiling activities must no longer be carried out.

REQUIREMENTS FOR THE PROVISION OF DATA



The provision of the data highlighted with an asterisk(*) is necessary for the creation of personal data in the Company's CRM or, if you are registering in the MyGewiss section, for the creation of a special account to use the services offered by the Company; the refusal to provide the aforementioned data therefore does not allow us to use the services.

The provision of data for marketing purposes, as well as for profiling and data transfer purposes to third parties, is, however, entirely optional: the processing will only be implemented by the Data Controller with its express and unequivocal consent, without prejudice to your right to revoke the consent given at any time.

DATA RECIPIENTS



The data may be processed by external parties operating as **data controllers** such as other Gewiss Group Companies, authorities and supervisory and control bodies and, in general, public or private subjects who are entitled to request the data.

The data may also be processed, on behalf of the Company, by external parties designated as **data processors**, who carry out specific activities on behalf of the data controller, for example, accounting, tax and insurance obligations, shipment of correspondence, management of collections and payments, etc. and/or companies of the Gewiss Group.

These subjects may essentially be included in the following categories:

- a. companies that offer e-mail sending services;
- b. companies that offer website maintenance services;
- c. companies that offer support in carrying out market studies.
- d. companies that offer marketing and telemarketing services;
- e. business partners in sales, co-marketing or event organisation activities;
- f. commercial agencies
- g. professional firms.

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SUBJECTS WHO MIGHT BE SENT THE DATA

With reference to the marketing purposes of third parties and/or third party profiling, with your specific consent, we may transfer your Personal Data to companies of the Gewiss Group, partners and suppliers that may improve the services offered by Gewiss. By way of example:

- business partners in sales, co-marketing or event organisation activities;
- telecommunication companies
- insurance companies
- companies supplying services such as light, water and gas
- real estate sector companies (construction companies, real estate management companies, real estate brokerage companies, etc.)
- financial companies and banks
- marketing research and market research companies
- companies that produce and market products for use and support for daily life, for example: computers, data networks and connectivity, entertainment, security,
- energy management, climate management, lighting).





SUBJECTS AUTHORISED FOR THE PROCESSING

The data may be processed by employees of the company departments assigned to pursue the purposes indicated above, who have been expressly authorized to process and who have received adequate operating instructions.





Personal Data will be processed within the European Union and stored on servers located within the European Union. If, due to technical and/or operational issues, it is necessary to use subjects located outside the European Union, or to transfer some of the collected data to cloudmanaged systems located outside the European Union, the processing will be regulated in accordance with the provisions of Chapter V of the GDPR and authorised on the basis of specific decisions of the European Union. All necessary precautions will therefore be taken in order to guarantee the utmost protection of Personal Data. In particular, the transfer will be carried out on the basis of the adequacy decisions of the third-party recipient countries expressed by the European Commission and adequate guarantees of the third-party recipient or on the basis of standard contractual clauses pursuant to Articles 44 et seq. of the GDPR.

RIGHTS OF THE INTERESTED PARTY - CLAIM TO THE CONTROL AUTHORITY



By contacting Gewiss S.p.A. via e-mail at privacy@gewiss.com, the data subjects may ask the data controller to access the data concerning them, delete them, correct inaccurate data, supplement incomplete data, and limit processing in the cases provided for by Art. 18 of the GDPR, as well as oppose processing in cases of the legitimate interest of the data controller.

In addition - and in the event that the processing is based on consent or contract and is carried out with automated tools - the data subjects have the right to receive the data in a structured format, of common use and readable by automatic device, as well as, if technically feasible, to transmit them to another data controller without impediments.

Data subjects have the right to withdraw their consent at any time for marketing and/or profiling purposes, as well as object to the processing of data for marketing purposes, including profiling related to direct marketing. It is still possible for the data subject who prefers to be contacted for the aforementioned purpose exclusively through traditional methods, to express their objection only to the receipt of communications through automated methods. The withdrawal of consent does not affect the lawfulness of processing based on consent prior to withdrawal.

Data subjects have the right to lodge a complaint with the competent Supervisory Authority in the Member State in which they reside regularly or work or in the State in which the alleged violation occurred.