

Incas S.p.A. S.U.

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Personal data processing policy under articles 13-14 EU Regulation 2016/679**Category of data subjects: clients and potential clients for purposes of direct Marketing.**

Incas S.p.A. S.U., as Controller of your personal data, according to and by the effects of the EU Regulation 2016/679 (General Data Protection Regulation), informs you that the aforementioned law provides for the protection of data subjects with respect to processing of personal data. This treatment will be based on principles of fairness, lawfulness, transparency and protection of your privacy and your rights.

Your personal data will be processed in accordance with the legislative provisions of the aforementioned law and the confidentiality obligations laid down therein.

Legal basis of the processing. For the purposes indicated above and having regard to the principle of accountability (article 5, paragraph 2 of the General Data Protection Regulation), the legal basis of the processing is lawful, inasmuch as the processing is necessary for the pursuit of the legitimate interest of the Controller, provided that the interests or the fundamental rights and freedoms of the data subject, which requires the protection of personal data, prevail.

Purposes. In compliance with the current legislation on the protection of personal data, in particular the principle of limitation of personal data purposes (article 5, paragraph 1, letter b), personal data will be processed by the Data Controller for the pursuit of the following purposes:

- Activity planning;
- To provide information on future commercial initiatives and announcements of new products, services and offers, both from us and from affiliated and/or controlled companies and commercial partners.

Modality of data processing. Your personal data may be processed in the following ways:

- Processing of data collected by third parties;
- Data collection through cards, coupons and questionnaires;
- Processing by electronic calculators;
- Manual treatment by means of paper archives.

Each treatment is carried out in compliance with the modalities set out in articles 6 and 32 of the GDPR and through the adoption of the appropriate security measures.

Your data will be processed only by personnel expressly authorized by the Controller and, in particular, by the following categories of privacy officers:

- Agents;
- Commercial Department;
- Marketing Department.

Disclosure. Your personal data will not be disclosed in any way.

Storage period. The determination of the storage period of the personal data of the interested party responds to the principle of limitation of the conservation (Article 5 (1), letter e, GDPR).

- The data will be kept for a period of time not exceeding that necessary for the purposes for which they were collected or subsequently processed, in compliance with the provisions of the Regulations. It is always possible, however, to renounce the receipt of information and marketing material through the link to waive the sending of such material included in each message.

Controller: the Data Controller, according to the Law, is Incas S.p.A. S.U. (via Milano 16 , 13856 Vigliano Biellese (BI); e-mail: mbadone@incasgroup.it; telephone no: 0158130370; VAT no: 01264020023) in the person of its legal representative pro tempore.

You have the right to obtain from the Controller the erasure (right to be forgotten), restriction, updating, rectification, portability, objection to the personal data processing, as well as in general can exercise all the rights established by the articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR.

EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the data subject.

1. . The data subject has the right to obtain confirmation of the existence or not of personal data concerning him / her, even if not yet registered, and their communication in intelligible form, and the possibility to complain to the supervisory authority.

The data subject has the right to obtain the indication:

- The origin of personal data
- Of the purpose and modalities of data processing;
- Of the logic applied in case of processing provided by electronic means;
- Of the identity and the contact details of the controller, of the legal representative and of the designated data protection Officer according to article 13;
- Of the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them in quality of legal representative in the territory of the State, Processors or privacy officers.

The data subject has the right to obtain:

- Updating, rectification or, when interested, integration of data;
- The erasure, transformation into anonymous form or data block processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- The attestation that the operations referred to in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disclosed, except the case in which this fulfilment proves impossible or involves a use of means manifestly disproportionate to the protected right;
- Data portability.

The data subject has the right to object, in whole or in part:

- For legitimate reasons, the processing of personal data concerning him/her, even if pertinent to the purpose of the collection;
- To the processing of his/hers personal data for the purpose of sending advertising or direct marketing material or for carrying out market research or commercial communication.