

### PRIVACY GDPR ORGANIZATIONAL MODEL

INFORMATION ON THE PROCESSING OF PERSONAL DATA "REQUEST THROUGH WEBSITE" EX ART. 13 GDPR

# INFORMATION ON THE PROCESSING OF PERSONAL DATA

### FROM REQUEST THROUGH WEBSITE

in accordance with art. 13 of the Regulation (EU) 2016/679 of the European parliament and of the council 27<sup>th</sup> April 2016

Pursuant to Art. 13 of the General Data Protection Regulation – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27<sup>th</sup> April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as "GDPR"), we hereby provide you with information regarding the exercise of your rights relating the personal data provided to allow the relationship with Nateeo S.r.l..

### Data Controller

The Data Controller is **Nateeo S.r.l.**, with registered office in Camisano Vicentino (VI) Via dell'Innovazione n. 1 - Italy - tax code and registration number with the Register of Companies of Vicenza: 03804370249 (hereinafter "**Controller**" or "**Company**").

### Data Protection Officer (hereinafter referred to as "DPO")

The Controller shall make use of the Group's DPO appointed pursuant to Article 37(2) of the GDPR. The DPO's contact details can be found on the Controller's website or at the Controller's registered office. To exercise your rights and for any communication, problem and/or request for clarification regarding the protection of your personal data, you may freely contact the DPO.

#### Mandatory purposes for which the processing does not require your consent

Purpose	Legal basis of the processing
Manage the storage of data, the	(Art. 6, paragraph 1, letter c), GDPR)
sending of information and	Processing necessary to fulfil a legal obligation to which the Controller is
communications, including electronic	subject
communications, requested by you	(Art. 6, paragraph 1, point (f), GDPR)
through the Company's website, the	Processing necessary for the pursuit of the legitimate interest of the
sending of documents relating to the	Controller in relation to the organisational, administrative, financial and
relationship with the Company,	accounting management of its organisation

### Optional purposes for which the processing requires your consent

Purpose	Legal basis of the processing
Promotional and marketing activities with the provision of material and	Art. 6, paragraph 1, letter a),
information on new products, promotions, discounts, benefits and other	GDPR)
services of interest to you related to your business, including by sending special material in paper form and / or electronic, by means of newsletters (e- mail, sms, mms, instant messaging); sending information and news about the Company and its activities by means of newsletters (e-mail, sms, mms, instant messaging); invitations to events organized or sponsored by the Company; carrying out market surveys and/or customer satisfaction surveys.	Consent of the data subject

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### Recipients of personal data

For the pursuit of the purposes indicated above, your personal data may be communicated to:

- employees and/or collaborators of the Data Controller, duly appointed as authorised and trained subjects on the methods of processing such data;
- other companies of the 'Cereal Docks' Group for performing and managing specific functions and/or services;
- third parties other than the Controller, such as:

Third parties or categories	Purpose	Notes
Computer companies	Management, maintenance, updating of	
	systems and software used by the	
	Controller and video surveillance	
	systems	
Providers of networks, electronic	Hosting, housing, Cloud, SaaS and other	Cloud Services may involve data
communication services and	remote IT services essential for the	processing in non-EU countries,
computer and telematic services	provision of the activities of the	which guarantee appropriate
for the storage and management of	Controller; filing and storage services in	confidentiality rights.
computer data	accordance with electronic documents	
Consultants, professionals, law	Judicial, extra-judicial and accident	
firms, arbitrators, insurance	insurance activities	
companies, experts, brokers; other	Organisational, administrative, financial	
providers of services related to the	and accounting management	
activity of clients/suppliers		

The companies of the Cereal Docks Group and third parties to whom your personal data may be disclosed act as:

- data controllers, i.e. subjects who determine the purposes and means of the processing of personal data;
- data processors, i.e. subjects who process personal data on behalf of the Data Controller;
- joint controllers of the treatment that determine jointly with the Company the purposes and means of the same.

The list and the updated information of the subjects identified as controllers, processors or joint controllers is available at the Company.

### Period of retention of personal data

We explain below the period of retention of personal data or, if this is not possible, the criteria used to determine this period.

Personal data and documents	Retention period or criteria for determining it
Personal data and documents	For the duration necessary to pursue the purposes of the processing and also
relating to the relationship with	subsequently, within the limits granted by law, for administrative and accounting
the Company	purposes, as well as to assert or protect the rights of the Controller, where
	necessary

### **Rights of the data subject**

We inform you of the existence of certain rights provided by the GDPR with regard to personal data and the processing thereof that you may request from the Controller.

Right	Description	How to make it effective
Right of withdrawal of consent (art. 13, paragraph 2, letter c)	You have the right to withdraw consent for the processing operations that need consent, without prejudice to the lawfulness of processing based on consent prior to revocation	Forms on the website or available from the Controller

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Right of access to data	You may request:	Forms on the
(art. 15)	(a) the purposes of the processing;	website or
(art. 15)	(b) the categories of personal data concerned;	available from the
	(c) the recipients or categories of recipients to whom the personal	Controller
		Controller
	data have been or will be disclosed, in particular where they are	
	recipients from third countries or international organisations;	
	(d) where possible, the envisaged period for which the personal data	
	will be stored, or, if not possible, the criteria used to determine that period;	
	(e) the existence of the right of the data subject to request the	
	Controller to correct or erase the personal data or to restrict the	
	processing of personal data concerning him or to object to their	
	processing;	
	(f) the right to lodge a complaint;	
	(g) all available information on the origin of data, when they are not	
	collected from the data subject;	
	(h) the existence of an automated decision-making process,	
	including profiling as referred to in Article 22(1) and (4), and, at least	
	in such cases, relevant information on the logic used and the	
	importance of and the anticipated consequences of such processing	
	for the data subject.	
	You have the right to request a copy of the personal data being	
	processed.	
Right of rectification	You have the right to request the rectification of inaccurate personal	Forms on the
(art. 16)	data concerning you and to obtain the integration of incomplete	website or
	personal data	available from the
		Controller
Right to be forgotten	You have the right to obtain from the Controller the erasure of	Forms on the
(art. 17)	personal data concerning you if the personal data are no longer	website or
	necessary with respect to the purposes for which they were	available from the
	collected or otherwise processed	Controller
Right to restriction of	You have the right to obtain from the data Controller the restriction	Forms on the
treatment	of the processing when you have complained about the accuracy of	website or
(art. 18)	the personal data (for the period necessary for the data Controller	available from the
	to verify the accuracy of such personal data) or when the processing	Controller
	is unlawful, but you oppose the erasure of personal data and instead	
	request that they be restricted in their use or when the data are	
	necessary for the establishment, exercise or defense of a right in	
	court, while the Controller does not need them anymore.	
Right to data	You have the right to receive in a structured format, commonly used	Forms on the
portability	and machine-readable, the personal data that you provide us with	website or
(art. 20)	and you have the right to transmit them to another Controller if the	available from the
	processing: (i) was based on consent, (ii) was based on contract and	Controller
	(iii) and if the processing is carried out by automated means, unless	
	the processing is necessary for the performance of a task carried out	
	in the public interest or in the exercise of official authority and such	
	transmission does not infringe the rights of a third party.	
Right to object	You have the right at any time to object, in whole or in part, to the	Forms on the
		website or
(art. 21)	processing of your personal data if the processing is carried out for	website of
	processing of your personal data if the processing is carried out for the pursuit of a legitimate interest of the Controller or if the	available from the
	the pursuit of a legitimate interest of the Controller or if the processing is carried out for direct marketing purposes. In this case,	

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Right to lodge a	You have the right to complain to the Control Authority if you	
complaint with a	consider that the processing of your data is in breach of the GDPR	
supervisory authority		
(art. 77)		

The exercise of these rights is subject to the limits, rules and procedures laid down by the GDPR. The data subject must know them and implement them. Furthermore, in accordance with the provisions of article 12, paragraph 3, the Controller shall provide the data subject with information relating to the action taken without undue delay and, in any event, no later than one month after receipt of the request. This period may be extended by two further months, if necessary, taking into account the complexity and number of the requests. The Controller shall inform the data subject of such extension, and of the reasons for the delay, within one month of receipt of the request.

### Changes and updates

This information may be subject to change and/or addition, including as a result of the applicability of the GDPR and any future changes and/or regulatory updates.

The updated information is constantly available on the website of the Controller.

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The personal data provided may be processed by the Data Controller with or without by computer tools.

We also inform you that the communication of your personal data for the mandatory purposes indicated is a legal or contractual obligation or a necessary requirement for the performance of contractual obligations, so you have the obligation to provide personal data, because otherwise you will not be able to manage the relationship with the Company.

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