

Information notice for customers

Art. 13-14 EU Regulation n. 2016/679 (GDPR)

OSARTIS GmbH is committed to data protection, therefore management and security of personal data are ensured with the utmost care, in accordance with the requirements of the legislation (EU Regulation 679/2016).

This information notice illustrates who we are, for what purposes we may use our customers' data, how we manage them, to whom they may be communicated (e.g. user companies, Tecres Group companies, public bodies, etc.), where they may be transferred and which are the rights of a data subject.

Who will process my data?

Your data will be processed, as Data Controller, by OSARTIS GmbH, with registered office in Auf der Beune 101 64839 Münster, Germany; datenschutz@osartis.de.

The list of Data Processors, which process personal data on the behalf of OSARTIS, is available at our headquarter.

Why do you need my data?

OSARTIS GmbH will use your data exclusively for the following purposes:

1. Purposes related to the management of the contractual relationship and the provision of Services: establishment, management and termination of the contractual and commercial relationship; fulfilment of accounting and tax obligations; fulfilment of legal obligations (e.g.: anti-terrorism controls); anti-money laundering controls; tax and accounting controls; litigation management; provision, support, updating and information about the Services offered and available features; where foreseen and requested, activation of the Advanced Electronic Signature service;
2. Purposes related to marketing activities, with your specific consent: market research; economic and statistical analysis; send information on social, cultural, solidarity initiatives to whom we participate; marketing; send advertising/informative/promotional material and updates on initiatives, promotions and offers of the Group and/or third party companies operating in collaboration with OSARTIS, also in relation to programs and promotions, including online, aimed at rewarding and/or retaining customers; communications and information on Group activities and events in which Group companies participate;

OSARTIS GmbH will carry out the data processing:

- on the basis of data subject's consent for the purposes indicated in paragraph 2-3 as stated in art. 6 sent. 1 lit. a) GDPR;
- for the contractual fulfilments referred to in point 1 (e.g. preparation and execution of the commercial contract) as stated in art. 6 sent.1 lit. b) GDPR;
- to fulfill legal obligations (e.g. accounting, remuneration, social security, anti-terrorism controls) as stated in art. 6 sent.1 lit. c) GDPR;
- to pursue a legitimate interest (e.g. anti-money laundering audits, use of video surveillance tools to protect company assets, fraud prevention, safeguarding company strategic interests and related business relationships) as stated in art. 6 sent.1 lit. f) GDPR.

The provision of personal data is mandatory only for purposes stated at point 1, for the others the granting of consent is optional.

Effective: January 2021

Any partial or total failure to provide data required will result in the partial or total impossibility to achieve the above purposes.

The extent and adequacy of the data provided will be evaluated from time to time, in order to determine the resulting decisions and to avoid the processing of data exceeding the purposes pursued.

We will not use your personal data for purposes other and further than those described in this policy, unless we inform you in advance and, where necessary, obtain your consent.

How will you use my data?

OSARTIS GmbH has as its objective the protection of its customers' data and their processing is based on the principles of correctness, lawfulness and transparency. We inform you, therefore, that your personal data will be processed using tools and procedures suitable to ensure maximum security and confidentiality, through archives and paper, with the help of digital media, computer and telematic means.

Data will be processed by internal resources within the offices of the Group Companies, suitably trained, who operate as authorized personnel to process the data.

The communications referred to in point 2) may take place in traditional ways (e.g., paper mail, telephone calls with operator), automated (e.g., telephone calls without operator) and similar (e.g. fax, e-mail, sms, mms).

You have in any time the right to object which, in the absence of any indication to the contrary, will be referred to both traditional and automated communications.

How long will you keep my information?

Your personal data will be stored, starting from their receipt/updating, for a period of time appropriate to reach the processing purposes. For further information, also with reference to the criteria used to determine this period, you can consult the appropriate privacy section on the website www.OSARTIS.de.

Will you share my information with others?

For the purposes set out in point 1, your data may be communicated to Group companies and to third parties, [including debt collection companies, user companies, professionals, bilateral sector entities pursuant to art. 24, paragraph 2, letter h), national collective bargaining agreements, supply agencies, public bodies, auditing or supervisory bodies], in order to comply with obligations deriving from the law, regulations, EU regulations or for aspects concerning the management and execution of the contractual relationship.

For the purposes set forth in point 2 Data can be shared with the following companies of Demetra Holding S.p.A, which OSARTIS is a part of, with registered office in Via Manfredo Camperio, n. 14 - 20123 - Milan (MI):

- Tecres S.p.A, with registered office in Via Andrea Doria 10 37066 Sommacampagna Verona (VR),
- Fapin S.r.l with registered office in Via Andrea Doria 10 37066 Sommacampagna Verona (VR),
- Elmdown S.r.l, with registered office in Via Manfredo Camperio, n. 14 - 20123 - Milan (MI).

For all the purposes above your data may also be communicated abroad, within and outside the European Union, in compliance with the rights and guarantees provided for by current legislation, after verification that the country guarantees an "adequate" level of data protection.

Your personal data will not be disclosed.

Which are my rights?

At any time, as stated in art. 15-20 GDPR you have the right to:

- access to your personal data;
- ask for their correction in case of inaccuracy;
- ask for cancellation;
- ask for the limitation of their treatment;
- the right to their portability, i.e. to receive the personal data you have provided in a structured, commonly used and machine-readable format.

You also have, as in art. 21 GDPR:

- the right to object to their processing:
 1. if use for the pursuit of a legitimate interest of OSARTIS GmbH;
 2. if processed for direct marketing purposes;

We will take care of your request with the utmost effort to ensure the effective exercise of your rights.

Finally, you will have the right to lodge a complaint with the national supervisory authority.

Can I withdraw my consent after I've given it?

Yes, you may revoke your consent at any time without:

- affect the lawfulness of processing based on consent given before the withdrawal;
- prejudice further processing of the same data based on other legal bases (for example, contractual obligations or legal obligations to which OSARTIS GmbH is subject).

I still have some questions...

For further information on this policy or on any privacy issues, or if you wish to exercise your rights or revoke your consent, you can contact directly the references indicated in the section "Who will process my data". For more information you can consult the privacy section on the website www.osartis.de.