

SUBJECT: Information to customers pursuant to art. 13 of EU Regulation 679/2016 ("Regulation") and of Legislative Decree No. 196/2003 and amendments

Dear Customer,

JRC Reflex Italia S.r.l. ("JRC Reflex"), with headquarters in Via Lago Maggiore n° 5/7, 24060 Chiuduno (BG), as Data Controller, makes the following information pursuant to art. 13 of the European Regulation 679/2016 ("GDPR") and of the Legislative Decree No. 196/2003 and subsequent amendments, to the subjects interested in the services offered ("Prospect") and to its Customers, in compliance with the principles of correctness, lawfulness, transparency and confidentiality of personal data.

1. Categories of processed data, source and purpose of processing

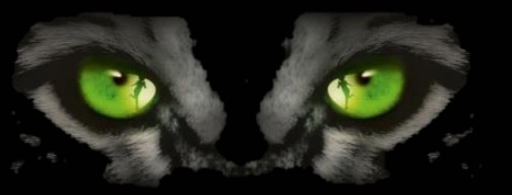
The treatment object of this information notice concerns common personal data such as, by way of example but not limited to, company name / personal data, fiscal code / VAT number, telephone number, e-mail address, IBAN, provided directly to the Data Controller from Prospect or by the Customer.

Personal data is collected and processed for the following purposes:

- (a) pre-contractual purposes: to respond to requests solicited by the Prospect or by the Customer and for any further activities instrumental to the signing and / or activation of the Services offered by JRC Italy;
- (b) contractual purposes: for the sale of services; for the technical, administrative and accounting management of complaints and disputes; for sending information and service communications;
- (c) purpose of fulfilling obligations established by EU and national regulations, including laws, pro tempore regulations in force and provisions also issued by Authorities legitimated to do so, as well as for purposes related to the ascertainment and suppression of crimes;
- (d) purposes related to the contract. In order to proceed with the sale of certain services, certain personal data is used that comes from archives or public records relating to company and financial data. These data are acquired through access to the information systems of authorized companies and are processed, where necessary, exclusively for the purposes of verification of reliability and punctuality in payments. JRC Italia will also be able to process data on the status and punctuality of the Customer in the payments of services provided in the past: such information, once acquired, will be stored and processed for the protection of the credit reasons of JRC Italia, for the purpose of evaluation of any further subscriptions and / or contractual proposals that can be subscribed by the Customer.

2. Legal basis of the processing, nature of the transfer and consequences of the possible refusal

The provision of personal data is necessary for the stipulation and execution of contractual relationships, to execute pre-contractual measures at the request of the interested party, to fulfill legal obligations or for reasons of legitimate interest as specified for the purposes described in point 1 at lett. a), b), c) and d) (in accordance with article 6 letter b), c) and f) GDPR). Any refusal would make it impossible for the Data Controller to proceed with the execution of the stipulated contract.



3. Processing methods

The data processing is carried out by JRC Reflex both through the use of manual tools and with the help of electronic means and in any case, so as to guarantee the security and confidentiality of the data.

4. Data retention

Personal data will be processed for the entire duration of the contract, up to 10 years for tax purposes and also subsequently for the purpose of asserting or protecting their rights. At the end of the period necessary for the aforementioned purposes the data is deleted.

5. Communication of data to third parties and dissemination

To pursue the aforementioned purposes, JRC Reflex may need to communicate personal data to third parties. These subjects belong to the following categories:

- (a) Public authorities and supervisory and control bodies when required by specific legislative, regulatory and authorization provisions;
- (b) Persons who perform tasks of a technical or organizational nature on behalf of the Data Controller; subjects that perform support services or instrumental to the contractual execution; subjects that perform services of acquisition, processing and processing of the data necessary for the use of services for customers; subjects that provide services for the management of the technological infrastructure; subjects that carry out archiving and data entry activities; studies and companies in the field of assistance and legal advice, including legal advice; subjects that carry out operations of control, revision and certification of the activities carried out by the company also in the interest of its Customers and users; credit card issuing companies; insurance companies.

The subjects belonging to the categories listed above process personal data as autonomous Data Controllers or as external Data Processors specifically appointed by JRC Reflex. The list of External Managers is available to the interested party, who explicitly requests it, at the registered office of the Data Controller.

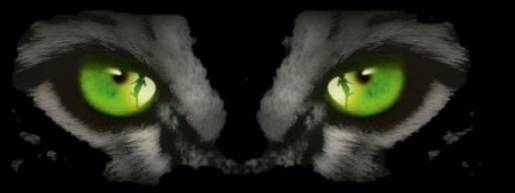
All employees who carry out their activities on the basis of the instructions received from the Data Controller are named "subjects authorized to process".

Personal data is not disseminated or transferred outside the European Union.

6. Rights of the interested party

Pursuant to the articles from 15 to 21 of EU Regulation 679/2016, specific rights are conferred on the interested party. In particular, the Prospect / Customer may:

- obtain confirmation of the existence of personal data concerning him, even if not yet recorded, access, and the same data and their origin, as well as the purposes, storage times, processing methods and applied logic in the case of processing carried out with automated tools;
- receive in a structured format, commonly used and readable by automatic device, the personal data processed and, unless it is not technically feasible, transmit the personal data directly to another Data Controller;
- obtain the deletion, transformation into anonymous form or blocking of data which does not need to be kept for the purposes for which the data was collected and processed;
- obtain the updating, rectification and integration of the data processed;
- object, in whole or in part, for legitimate reasons, to the processing of personal data concerning him, even if pertinent to the purpose of the collection;
- lodge a complaint with the supervisory authorities.



It is specified that the exercise of these rights must not prejudice and / or damage the rights and freedoms of others.

These rights may be exercised at any time by writing to JRC Reflex Italia S.r.l. with headquarters in Via Lago Maggiore n ° 5,7, 24060 Chiuduno (BG), or via email at amministrazione@jrc-reflex.com.

This document has been updated on September 2020.

Chiuduno, 9 September 2020

Il Titolare del trattamento

JRC REFLEX ITALIA S.r.l.