

## PRIVACY POLICY NEWSLETTER – pursuant to article 13 and 14 of the EU Regulation 2016/679 - GDPR

Synergetic pursuant to article 13 and 14 of the EU Regulation 2016/679 as owner of the treatment of the website [www.synergetic-italy.it](http://www.synergetic-italy.it) would like to inform its interested parties that the personal data referring to them will be treated in a lawful and correct way, transparent according to methods and for the purposes illustrated below.

In compliance with the provisions of EU Reg. 2016/679 Synergetic manages your data and their security are guaranteed with the utmost care, in compliance with the requirements of the aforementioned privacy legislation. The information must not be considered valid for other websites that may be consulted through links on the domain owner's internet sites, which are not to be considered in any way responsible for third party websites.

The information is also based on the provisions of Directive 2002/58 / EC, as updated by the Directive 2009/136/CE concerning Cookies and the provisions of the Provision of the Authority for the protection of personal data of 08.05.2014 regarding cookies.

**DATA CONTROLLER** pursuant to artt. 4 e 24 of GDPR 679/2016 of the web site [www.synergetic-italy.it](http://www.synergetic-italy.it) is Synergetic Strada Budellungo, 2 43123 Parma Italia of its pro tempore representative, , e-mail: [info@synergetic-italy.com](mailto:info@synergetic-italy.com)

**DATA PROCESSOR**, The list of data processors pursuant to articles and 28 of EU Regulation 2016/679 is constantly updated and available by writing to [info@synergetic-italy.com](mailto:info@synergetic-italy.com) or at address administrative and operational in Strada Budellungo, 2 43123 Parma Italia

### LEGAL BASIC PURPOSE FOR THE ELABORATION OF YOUR PERSONAL DATA

The personal data provided will be processed in compliance with the conditions of lawfulness pursuant to art. 6 f) EU Reg. 2016/679 for the following purposes:

- possible compilation of data collection form for receiving newsletters or promotional communications in general via e-mail.

Data processing is based on Article 6 f): (recital 47), taking into account the reasonable expectations of the data subject at the time and in the collection of personal data, when the data subject can reasonably be expected that treatment is carried out for this purpose.

### DESTINATION AND CATEGORIES OF DATA PROCESSED

Personal data collected will be communicated to persons who will process the data in their capacity as data processors (art. 28 del Reg. UE 2016/679) and/or in their physical capacity acting on behalf of the Controller or the Processor, for the reasons above listed. More specifically, the data will be transmitted to:

- to the sales/distribution network within the territory;

- persons who provide IT management services and their communications networks (including email) ;

- firms of companies who provide assistance and consultancy;

- competent authority for compliance with legal obligations and/or provisions of public bodies upon request; for accounting and administration purposes, data could be communicated to business information service to verify solvability and ability to meet financial commitments and/or to persons appointed for debt recovery purposes. Persons pertaining to these categories will be appointed Data Processors or will operate autonomously as data Controllers. The list of persons responsible for processing data will be updated and will be available upon request by email [info@synergetic-italy.com](mailto:info@synergetic-italy.com) or at address administrative and operational in Strada Budellungo, 2 43123 Parma Italia

### TRANSFER OF DATA TO ANOTHER STATE AND/OR INTERNATIONAL ORGANISATION AND GUARANTEES.

Personal data collected will be transferred to Countries within the EU and countries outside the EU in order to achieve the scope described above. Data will be transferred pursuant to Article 44 – General Principles for transfer of data; Article 45 – Transfer on the basis of an adequacy decision; Article 46 - Transfers subject to appropriate safeguards, more specifically data will be transferred:

- to third party state or international organisations which the Commission deems adequate (art. 45 EU Reg. 2016/679)

- to third party states or international organisation which have provided adequate guarantees or on condition that enforceable data subject rights and effective legal remedies for data subjects are available. (art. 46 Reg. EU 2016/679, even by means of contract clauses and other provisions pursuant to article 46, paragraph 3)

- to third party states or international organisations in terms of binding corporate rules which form part the same group (art. 47 EU Reg. 2016/679)

-to third party international organisation on the basis of derogations for specific situations (art. 49 EU Reg. 2016/679). The data subject may obtain information regarding guarantees for transfer of data via email at the address [info@synergetic-italy.com](mailto:info@synergetic-italy.com)

### PERIOD OF CONSERVATION OF DATA OR CRITERIA FOR DETERMINING THE PERIOD

The processing will be carried out in an automated and manual way, with methods and tools aimed at guaranteeing maximum security and confidentiality, by subjects specifically appointed to do so. In compliance with the provisions of art. 5 paragraph 1 letter e) of Reg. UE 2016/679 the personal data collected will be stored in a form that allows identification of data subjects for a period of time not exceeding the achievement of the purposes for which the personal data are processed.

The retention of personal data provided depends on the purpose of the processing: - receiving newsletters or promotional communications in general via e-mail until consent is revoked; timing determined on the basis of criteria that the interested party can have information by writing to [info@synergetic-italy.com](mailto:info@synergetic-italy.com)

### HOW YOU CAN EXERCISE YOUR RIGHTS ?

You may exercise your right pursuant to EU Regulation 2016/679, by referring to the data Controller, sending an email to the email address [info@synergetic-italy.com](mailto:info@synergetic-italy.com) or by writing to the Data Controller as above indicated. You have the right at any time to request the Controller to grant access to Your personal data (article 15), to rectify data (article 16) and to cancel data (art 17) or to limit processing of data (art 18) Revocation of consent: Processing of personal data is not grounded on consent by on legitimate interest; if processing is based on consent, you have the right to revoke consent at any moment without effecting the lawfulness of processing based on consent expressed prior to revocation; To object to processing of data or to exercise other rights you may right to [info@synergetic-italy.com](mailto:info@synergetic-italy.com).

You have the right to object to the supervisory authority; Communication of personal data is a contractual obligation. Failure to provide information will make it impossible to enter into the agreement. There is no automated decisional process in place.

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