



## Information for the processing of personal data

In compliance with the provisions of Regulation (EU) 2016/679 on the Protection of Personal Data, pursuant to art. 13 and 14, this document provides all the necessary information concerning the processing of personal data.

The first section describes the processing methods valid regardless of the qualification of the interested party. The second part differentiates the methods of treatment depending on whether the interested party is a customer, a supplier or an agent. At the end of the document are described the methods for managing the data deriving from the use of the Website.

### Data Controller

As defined by art. 4, paragraph 7, the data controller is:

**Logic S.p.A.**

**Via Galileo Galilei n. 5, 20051 Cassina de' Pecchi, Milano, Italia**

### Processed data

The processed data were provided by you, or collected from other sources, during the collaboration established for the supply of Logic's products or the provision of related services. Please note that, if your entity is a legal person, the personal data subject to protection will be limited to those of the natural persons representing it.

### Data Retention

All data and documents will be kept for the time necessary to carry out any related obligations, those deriving from the service requested or those deriving from legal or contractual obligations as required by the relevant regulations.

### Data Subject Rights

Pursuant to GDPR, the Data subject has the right to ask the Data Controller for access to personal data (Article 15), rectification (Article 16), deletion or oblivion (Article 17), the restriction of the processing of his/her personal data (Article 18), the right to data portability (Article 20) or to object to their processing (Article 21), in addition to the right not to be subject of a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or which significantly affects his/her person (Article 22). If the processing of personal data is based on



the explicit consent of the Data Subject, pursuant to art. 7 paragraph 3 of the Regulation, the Data Subject has the possibility to withdraw his/her consent at any time.

Requests may be made to the Data Controller using the following methods:

- Registered letter to the address Via Galileo Galilei n. 5, 20051 Cassina De 'Pecchi, Milan (Italy);
- E-mail to the e-mail address: [privacy@logic-spa.com](mailto:privacy@logic-spa.com)

The data subject also has the right to lodge a complaint with the supervisory authority (Article 77 of GDPR) if he/she considers that the processing performed by the Data Controller is not compliant.

### **Legal basis of the processing**

Pursuant to Art. 6 of the Regulation, the processing is lawful as it is necessary for the correct and complete execution of the contractual or pre-contractual obligations assumed between you and Logic, and as such, does not require consent to the processing of data. For different and further purposes, the processing is based on the explicit consent of the Data Subject.

The Data Controller will process your personal data in a lawful, correct and transparent manner, in compliance with the principles established by the GDPR, ensuring the protection of your personal data and fundamental rights and freedoms.

### **Provision of data**

The refusal to provide data precludes Logic from establishing and managing the contractual relationship with our Company and, as such, is mandatory and does not require consent to the processing of data.

### **Processing modality**

The processing of data may consist in collection, as well as in registration, storage, enquiry, processing, modification, comparison, use, communication, spreading, etc. and will be carried out using hardcopies and electronic computer tools adopting appropriate security measures to ensure the protection of personal data.

People who may have access to personal data, within the limits strictly necessary to fulfill the aforementioned purposes, are authorized by Logic S.p.A. to process personal data, after that they will be cancelled or anonymized.

### **Defence in court**

The Data Controller reserves the right to process your personal data for purposes of defence in court or for any legal dispute resulting from abuse or illegal behaviour. The Data Controller may also communicate the personal data of the Data Subject to public authorities in the cases provided for by law.

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## **IF THE SUBJECT IS A CUSTOMER**

### **Processing purpose**

Personal data will be processed by paper, computer and electronic means for the following purposes:

- collection and management of orders;
- verification of information and subsequent creation of customer master data;
- dunning activities;
- Customer Service activities and analysis and evaluation of customer trends, to monitor the quantity of orders received, any increases or decreases, more or less active customers, etc.;
- management of the contractual relationship (e.g. acquisition of preliminary information to the conclusion of a contract, execution of operations based on contractual obligations, administrative and accounting management, etc.).

### **Recipients of the Data**

People who may have access to personal data, within the limits strictly necessary to fulfill the aforementioned purposes, are authorized by Logic S.p.A. to process personal data. The company entrusts external subjects and / or companies with the performance of some corporate management functions to whom it communicates the necessary data, in particular:

- Public bodies and administrations for audits and controls in compliance with tax and civil obligations;
- Banks and credit institutions for carrying out economic transactions (payments / collections);
- Tax accountants and consultancy companies for activities related to the preparation of financial statements and auditing of financial statements and for the control of the corporate organizational management system;
- Consultants and law firms;
- IT systems maintenance companies.

Moreover, we inform you that the data concerning your staff may also be disclosed to third parties in the context of company operations.

An exhaustive list of appointed external Data Processors is available at the Data Controller's Head Office.

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## **IF THE SUBJECT IS A SUPPLIER**

### **Processing purpose**

We inform you that the personal data collected during the contractual relationship with Logic S.p.A. will be processed for the purposes and with the methods mentioned below:

- Management of contractual relationships and anything relating to the correct contract/agreement execution in administrative, business, management and organizational terms for the use of goods and services received;
- Verification of the information, reliability analysis and periodic verification of the requirements by audits;
- Creation of supplier master data;
- Management of internal monitoring and management activities;
- Management of legal actions;
- Fulfillment of legal requirements and obligations such as communications to public authorities.

### **Recipients of the Data**

People who may have access to personal data, within the limits strictly necessary to fulfill the aforementioned purposes, are authorized by Logic S.p.A. to process personal data.

The company entrusts external subjects and / or companies with the performance of some corporate management functions to whom it communicates the necessary data, in particular:

- Public bodies and administrations for audits and controls in compliance with tax and civil obligations;
- Banks and credit institutions for carrying out economic transactions (payments / collections);
- Tax accountants and consultancy companies for activities related to the preparation of financial statements and auditing of financial statements and for the control of the corporate organizational management system;
- Consultants and law firms;
- IT systems maintenance companies.

Moreover, we inform you that the data concerning your staff may also be disclosed to third parties in the context of company operations.

An exhaustive list of appointed external Data Processors is available at the Data Controller's Head Office.

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## **IF THE SUBJECT IS AN AGENT**

### **Processing purpose**

We inform you that the personal data collected during the contractual relationship with Logic S.p.A. will be processed for the purposes and with the methods mentioned below:

- Fulfillment of legal and contractual obligations;
- Management of personal data and user profile with related access permissions;
- Analysis of sales and performance;
- Maintenance activities and technical assistance regarding the correct use of IT company devices possibly granted to use;
- Mandatory purposes related to fulfillment of legal requirements and obligations, such as communications to public authorities;
- Prevention and resolution of disputes related to relationship of collaboration, management of possible complaints, as well as all the possibly related aspects.

### **Recipients of the Data**

Persons who may have access to your personal data, within the limits strictly necessary to fulfill the aforementioned purposes, are authorized by Logic S.p.A. to process personal data.

The company entrusts external subjects and/or companies with the performance of some corporate management functions to whom it communicates the necessary data, in particular:

- Banks and credit institutions;
- Law firms;
- Associated firms, Accountants;
- IT systems maintenance companies

Your personal data will not be transferred outside the territory of European Union.

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## Privacy Policy Website

### *Information according to the European regulation on personal data protection n.2016 / 679*

This page describes the modalities with which **Logic S.p.A.** (hereinafter “**Logic**”), as Data Controller, collects and processes your personal data through this website.

For Logic, attention to privacy, confidentiality and protection of personal data of customers has always been an absolute priority. That said, in compliance with the provisions of art. 13 of the Regulation (EU) 2016/679 on the Protection of Personal Data (hereinafter, “GDPR”), we provide the Users with this information, describing the following elements of the processing.

### **Processing purpose**

Logic informs that the processing of personal data collected directly from the website [www.logic-spa.com](http://www.logic-spa.com) through Logic e-mail addresses, is aimed at satisfying the specific request submitted by the User (such as the request for information or sending an unsolicited application).

The User is free to provide personal data through the e-mail addresses in the contact area in order to forward requests for information, for contact or for information material or to send other miscellaneous communications.

Sending an e-mail to any Logic address may result in the subsequent acquisition of the sender's address, necessary for responding to the requests, as well as of any other personal data included in the message. This processing is based on the principle expressed in Article 6 of the Regulation, according to which the processing of personal data is permissible if necessary for performing the service requested by the data subject.

The provision of the aforementioned data is optional; however, it is necessary for satisfying your request: without your data, in fact, we cannot provide you with the requested service.

### **Types of collected personal data**

The personal data collected through this website are personal data and contact details, the name of the company he/she works for as well as the message the visitor sends to the Data Controller.

### **Processing modality**

The processing of personal data means the collection, registration, organization, storage, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, cancellation and destruction, or the combination of two or more of these operations, also using automated tools for storing, managing and transmitting the data, which are appropriate for ensuring security and confidentiality.

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With regard to security, we inform you that only the personnel appointed by the Data Controller accesses the database and executes the above-mentioned operations. Your data will be processed using methods and tools appropriate for guaranteeing confidentiality, which can be electronic, automated or non-automated means (hardcopy archives). All means are equipped with adequate security measures, as required by the GDPR, to prevent data loss, illicit or incorrect use and unauthorized access.

## **Communication of data to third parties**

Without prejudice to any communication required for complying with legal obligations, the Data Controller will communicate the personal data provided by the visitors – acting with caution – only to suppliers selected for supporting the requested service, and which are appropriately appointed External Data Processors, such as: commercial and operational partners; consultants and collaborators appointed for providing for example assistance in tax, accounting and legal consultancy; IT system service providers.

## **Data retention**

Personal data submitted via the website will be retained for the time necessary to complete the request, that is for the performance of the services.

## **Data Subject Rights**

Pursuant to the European Regulation 679/2016, the Data Subject has the right to ask the Data Controller for access to personal data (Article 15), rectification (Article 16), deletion (right to be forgotten) (Article 17) , the restriction of the processing of his/her personal data(Article 18), the right to data portability (Article 20) or to object to their processing (Article 21), in addition to the right not to be subject of a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or which significantly affects his/her person (Article 22). If the processing of personal data is based on your explicit consent, pursuant to art. 7 paragraph 3 of the Regulation, you have the possibility to withdraw your consent at any time.

You also have the right to lodge a complaint with the supervisory authority (Article 77 of the Rules) if you consider that the processing carried out by the Data Controller is not compliant.

Requests may be made to the Data Controller by writing to: [privacy@logic-spa.com](mailto:privacy@logic-spa.com).

## **Changes to this policy**

Logic reserves the right to modify this information as necessary. We invite you to check this page periodically if you want to monitor changes.

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