

# PRIVACY MANUAL

Documentation was drawn up in compliance with  
GDPR 2016/679 'General Data Protection Regulation'.  
and national legislation in force

## L&S ITALIA SPA

Via L. Zanussi, 8  
33070 Brugnera (PN)  
Tel. +39 0434 616611 - Fax +39 0434 616651  
eM.: info@ls-light.com

**SUBJECT: Information is under and following Articles 13 and 14 of the GDPR 2016/679 and current national legislation on the protection of personal data processing.**

With this information notice, L&S ITALIA SPA provides the Data Subject with the information referred to in Articles 13 and 14 of the GDPR 2016/679 with regard to the processing of personal data concerning him/her.

### Data Controller.

The Data Controller is L&S ITALIA SPA, with registered office in Via L. Zanussi, 8 - 33070 Brugnera (PN).

### Data Protection Officer (DPO or RPD).

The Data Controller has designated a Data Protection Officer (DPO/RPD), who the Data Subject can contact for all matters relating to processing personal data and exercising rights under GDPR 2016/679. The contact details of the DPO/RPD are as follows: rpd@legalmail.it.

### Purpose and legal basis of processing.

Personal data are collected and processed to conduct the following:

1. fulfilment of all operations imposed by regulatory obligations, tax and fiscal provisions and anti-money laundering requirements (processing necessary to fulfil a legal obligation to which the Data Controller is subject under Art. 6 para. 1 let. c) GDPR 2016/679);
2. the establishment and performance of ongoing contractual relationships, as well as any pre- and post-sales assistance activities (processing necessary for the performance of a contract to which the Data Subject is party or the performance of pre-contractual measures taken at his/her request under Art. 6 par. 1 let. b) GDPR 2016/679; processing necessary to comply with a legal obligation to which the Data Controller is subject under Art. 6 para. 1 let. c) GDPR 2016/679);
3. operations strictly connected with and instrumental to the establishment of the relations above, including the acquisition of information before the conclusion of the Contract (processing necessary for the performance of a contract to which the Data Subject is party or for the performance of pre-contractual measures taken at his or her request under Art. 6 par. 1 let. b) GDPR 2016/679);
4. the management of relations with the customer for administration, accounting, orders, shipments, invoicing, services, management of any out-of-court settlement of disputes where applicable (processing necessary for the performance of a contract to which the Data Subject is party or the performance of pre-contractual measures taken at the latter's request under Art. 6 par. 1 let. b) GDPR 2016/679);
5. the management of any legal disputes (processing attributable to the legitimate interest of the Controller pursuant to Art. 6 para. 1 let. f) GDPR 2016/679, strictly limited to the establishment, exercise and defence of a right in court);
6. the provision of services in general, dealing with management procedures of means, things and persons, connected with the main supply (processing necessary for the performance of a contract to which the Data Subject is party or the performance of pre-contractual measures taken at his or her request under Art. 6 par. 1 let. b) GDPR 2016/679);
7. In particular, sending advertising or direct sales material, carrying out market research or commercial communication via email, paper mail, sms/mms and instant messaging services, in full compliance with the GDPR 2016/679, the national legislation in force, in particular Art. 130 Legislative Decree 30 June 2003, no. 196, and of the Provision of the Guarantor Authority of 4 July 2013 'Guidelines on promotional activities and the fight against spam' (processing subject to consent, except in cases where it can be dispensed with under Article 130 paragraph 4 of Legislative Decree no. 196 of 30 June 2003);
8. Customer satisfaction surveys, the processing of statistics for internal use (processing attributable to the Data Controller's legitimate interest under Art. 6 par. 1 let. f) GDPR 2016/679, strictly limited to the control of internal quality standards).

Data will be collected and recorded following the principles of Article 5 GDPR 2016/679, i.e., for specified, explicit and legitimate purposes and in a manner compatible with those purposes, as part of the processing necessary for the operation of the business; accurately and if necessary with appropriate updates. In such a way that they are relevant, complete and not excessive concerning the purpose of the collection so that they are kept for the period necessary for the purpose for which they were collected and subsequently processed under GDPR 2016/679 and applicable national law.

Personal data may be processed with the aid of both paper and telematic tools, or in any case, tools designed to record and store the data, and in any case in such a way as to guarantee their security and protect the utmost confidentiality of the Data Subject. Specific security measures will be observed to prevent loss of data, unlawful or incorrect use and unauthorised access in full compliance with Article 32 of GDPR 2016/679 and applicable national legislation.

### Compulsory or optional nature of providing data and consequences of refusal to provide data.

The provision of personal data required for the fulfilment of legal obligations, for the establishment of the contractual relationship or for its execution is mandatory. Failure to do so will result in the impossibility of fulfilling the Data Subject's requests or executing the Contract.

Consent to the provision of personal data for information, promotional and/or marketing purposes is optional and, if given, may be revoked at any time without prejudice to the lawfulness of the processing based on the consent given before revocation. Failure to do so will make it impossible for the undersigned to send you commercial communications.

### Anti-Money Laundering and Anti-Terrorism.

The provision of the data required by Anti-Money Laundering and Anti-Terrorism legislation is mandatory, and any refusal to provide it precludes the professional service requested and may result in the transaction being reported to the competent supervisory body. In this regard, it should be noted that the processing of personal data related to anti-money laundering obligations will occur regarding the specific implementation modalities imposed on non-financial operators by the Regulation on identifying and retaining the information under Art. 3 paragraph 2 of Legislative Decree no. 56/2004 and adopted by Ministerial Decree no. 143/2006. Other information may also be taken from public sources to comply with the obligations of Legislative Decree 231/2007.

### Communication of data.

Without prejudice to compliance with the regulations in force and in particular with the principles set out in Article 5 GDPR 2016/679, the data may be disclosed, solely for the pursuit of the purposes mentioned in this notice, to:

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L&S ITALIA SPA		VAT no./C. Fiscal: 01749420939	

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- Companies belonging to the same business group;
- Persons to whom it is necessary to communicate the data for the fulfilment of a contract to which the Data Subject is a party or for the fulfilment of pre-contractual measures taken at the Data Subject's request, as well as, in general, for the pursuit of the purposes mentioned in this notice;
- Credit management entities such as, for example, factoring companies, credit institutions, debt collection companies, credit insurance companies, commercial information companies;
- In particular, subjects who carry out processing on behalf of the Data Controller in their capacity as Data Processors pursuant to Article 28 GDPR 2016/679, such as, purely by way of example and not limited to: professionals and/or Companies appointed to carry out activities in the administrative-accounting, legal, commercial, management, technical, technical-informatics fields. The complete and up-to-date list of the Persons in charge is available to those entitled to it by simple request at the Controller's head office;
- Persons authorised to access the data by the legislation in force and/or to whom the data must be disclosed to comply with legal obligations.

Personal data may be processed by employees and collaborators assigned to the competent offices of the Data Controller, who are explicitly authorised to process them based on Article 29 of GDPR 2016/679 and the applicable national legislation.

### Transfer of data abroad.

Personal data may be communicated and/or transmitted abroad, also to non-European third countries, only for the pursuit of the purposes set out in this information notice or for exclusively technical reasons related to the structure of the Company's Information System and/or the application of technical and organisational security measures deemed appropriate by the Data Controller (Art. 32 GDPR 2016/679), and exclusively in compliance with Art. 44 s.s. of GDPR 2016/679.

### Data retention periods.

Subject in all cases to compliance with Article 5 GDPR 2016/679 ('principle of limitation of storage'), the data will be stored in our archives according to the following parameters:

- Data processed for the fulfilment of obligations under Article 2220 of the Civil Code: 10 years, without prejudice to any late payment of fees justifying its extension;
- Data processed for the fulfilment of anti-money laundering obligations: 10 years;
- Data processed for information, promotional and/or marketing purposes: 24 months;
- Data processed for purposes other than the above, in the context of the contractual relationship and as set out in this notice: until the end of the contract and/or the commercial supply relationship.

Concerning specific statutory limitation periods, data necessary for establishing, exercising or defending a right in court may be subject to more extended storage periods.

Checks on the obsolescence of stored data concerning the purposes for which they were collected are carried out periodically.

### Rights of the Data Subject.

With regard to such personal data, the Data Subject may exercise the rights provided for within the limits and under the conditions laid down in Articles 15 to 22 of GDPR 2016/679 and the applicable national legislation. More specifically, the GDPR attributes to the Data Subject:

- Right of access (Art. 15 GDPR 2016/679);
- Right to rectification of inaccurate personal data and correct to supplement incomplete personal data (Art. 16 GDPR 2016/679);
- Right to cancellation (Art. 17 GDPR 2016/679);
- Right to restriction of processing (Art. 18 GDPR 2016/679);
- Right to request the recipients to whom any rectification or cancellation, or restriction of processing has been communicated (Art. 19 GDPR 2016/679);
- Right to data portability (Art. 20 GDPR 2016/679);
- Right to object (Art. 21 GDPR 2016/679);
- Right not to be subject to a decision based solely on automated processing (Art. 22 GDPR 2016/679).

In the event of signing any form of consent to the processing, please note that the Data Subject may revoke it at any time, without prejudice to the mandatory fulfilments provided for by the legislation in force at the time of the revocation request, by contacting the Data Controller at the following e-mail address: info@ls-light.com.

### Right of Complaint

A Data Subject who considers that the processing of personal data is in breach of the provisions of GDPR 2016/679 has the right to lodge a complaint with the supervisory authority of the EU State where he or she normally resides, works, or where the alleged breach occurred, as provided for in Art. 77 GDPR 2016/679, or to take appropriate legal action.

Brugnera, 26/04/2023

L&S ITALIA SPA

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