

## Privacy Policy for “Customers”



### 1. Data Controller

**FECS Partecipazioni SpA**, with registered offices at Via Gramsci, 20, 24040 Verdellino (BG), Tax ID Code and VAT reg. no. 03244500165, hereinafter “Controller”, guarantees full compliance with data protection regulations, and provides the following information with regard to data processing, pursuant to Art. 13, EU Regulation 2016/679 (General Data Protection Regulation – GDPR) and subsequent amendments.



### 2. Data processed, purposes and legal grounds for processing

Data acquired will be processed for the following purposes:

- a) for customer relations based on contractual and pre-contractual agreements;
- b) for administrative purposes and to fulfil legal obligations, such as, for example, accounting or fiscal obligations, or to meet requests from judicial authorities;
- c) for the occasional sending of emails concerning products and/or services already supplied or similar to same (so-called “soft spam”).

The legal basis for lawful processing:

- With regard to the purposes as stated in point 2 letter a) and b), it is the performance of a contract to which the data subject is party or the execution of pre-contractual measures adopted at the request of same;
- with regard to the purposes as per point 2 letter c), it is the legitimate interest of the Controller.



### 3. Nature of provision

Provision of data:

- with regard to the purposes as per point 2 letter a) and b), it is optional but any refusal will involve the impossibility for the Controller to meet the contractual undertakings.

- with regard to the purposes as per point 2 letter c), it is optional but any refusal will make it impossible to send occasional emails concerning products and/or services similar to same (so-called “soft-spam”).



#### **4. Processing locations and methods and data retention times**

The data collected from the website are processed at the Controller’s headquarters.

Data collected will be processed using electronic or in any case, automated or computerised or telematic means, or using manual processing with logic strictly related to the purposes for which said personal data were collected and, in any case, in such a way as to guarantee the security of same.

Data are retained for the time strictly necessary to the purpose for which they were processed (“storage limitation principle”, Art.5, EU Regulation 2016/679), or in compliance with the expiry set out in current standards or obligations set down by law.

Checks of the obsolescence of data stored in line with the purposes for which they were collected will be made regularly.

In any case, the Data Controller implements rules that prevent permanent data retention and therefore, limits the retention time according to the principle of minimizing data processing.



#### **5. Authorised subjects, data processors and data communication**

The processing of data collected is performed by the Data Controller’s internal staff, appointed for this purpose and authorised to perform processing according to specific instructions issued in compliance with current regulations.

The data collected, within the limits pertaining to the purposes of processing stated and in the event it is necessary or useful for the execution of the purposes itself, can be processed by third parties appointed by external Processors, i.e., according to cases, communicated to those subjects necessary for the correct completion of the aims set out in point 2.

The data collected can be provided, in the event of lawful request, solely in the cases envisaged by law, by the Legal Authority.

Under no circumstances will your data be circulated in any way.



## 6. Data transfer to non-EU countries

Data can be transferred to non-EU countries and specifically, to the United States, only subsequent to checks of the Standard Contractual Clauses adopted/approved by the European Commission, pursuant to Art. 46, par. 2, letter c) and d) of the GDPR or binding standards for the company as per Art. 47 of the GDPR or, if not, according to one of the derogating measures, as stated in Art. 49 of the GDPR.

The transfer to the United States is authorised according to the specific agreement known as the EU-US Data Privacy Framework (available at [here](#)), for which there is no further consent required.



## 7. Data subject's rights

With regard to the personal Data communicated, the Data subject has the right to exercise the following rights:

- a. (Art. 7.3 Regulation EU 679/2016 – GDPR) withdrawal of consent;
- b. (Art. 15 Regulation EU 679/2016 – GDPR) accessing and asking for a copy;
- c. (Art. 16 Regulation EU 679/2016 – GDPR) requesting correction;
- d. (Art. 17 Regulation EU 679/2016 – GDPR) requesting deletion (“right to be forgotten”);
- e. (Art. 18 Regulation EU 679/2016 – GDPR) obtaining data minimisation;
- f. (Art. 20 Regulation EU 679/2016 – GDPR) receiving data in a structured format, commonly used and readable from an automatic device, for the purposes of exercising the right to portability;
- g. (Art. 21 Regulation EU 679/2016 – GDPR) opposing processing.

The data subject can exercise their rights as well as ask for more information about their Personal Data, by sending an email to [info@fecs.it](mailto:info@fecs.it) and specifying the content of their request in the subject line.

Requests concerning the Data subject's choice to avail of their rights will be issued without undue delay and, in any case, within one month of the request; only in particularly complex cases and large number of requests, may this be extended by a further 2 (two) months.

Please remember that it is your right (as per art. 77 Regulation EU 679/2016 – GDPR) to submit a complaint to the Data Protection Authority, whose contact information is available [here](#)

*Latest update: 23rd July 2024*

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