

# Privacy Policy – Clients

**Start Promotion S.r.l**  
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*Information on personal data processing (Section 13, Legislative Decree 196/2003)*

## **Data Subjects: Clients**

In keeping with Legislative Decree no. 196 of June 30 2003 (Personal Data Protection Code, hereinafter referred to as “Privacy Code”), Start Promotion S.r.l. as Data Controller for processing your personal data herewith inform you that the above mentioned Privacy Code provides for the protection of individuals and other entities with regard to personal data processing and that this processing will be inspired to principles of fairness, lawfulness, transparency and protection of your privacy and rights.

Your personal data will be processed in accordance with the provisions of the above mentioned law, as well as with the confidentiality obligations therein set out.

**Processing Purposes.** Your data will be processed for purposes related to the fulfilment of the following obligations, either legal or contractual:

- Fiscal and accounting obligations
- Post-sales support
- Management of legal disputes
- Client management
- Quality management
- Fulfilment of market surveys and/or statistics, as well as promotional activities including mailing of advertising material, if applicable
- Business planning
- Customer satisfaction audit
- Invoice record management

The processing of data required to fulfil the above obligations is necessary for a proper management of our business relation and the provision of such data is mandatory to satisfy the purposes above. The Data Controller also informs you that, in case any of the mandatory information are not provided or are provided incorrectly, the Data Controller might be unable to guarantee the correct and adequate processing of your personal data.

**Processing Methods.** Your personal data can be processed as follows:

- Possible charge of a third party for processing tasks
- Creation of customer, supplier or user profiles
- Data collection in a public or open to public place
- Data collection through information or telematic technologies
- Temporary processing for rapid data aggregation or anonymization
- Data processing through electronic calculators
- Data processing through paper records.

Data will be processed in accordance with the provisions of Sections 11, 31 and subsequents of the Privacy Code and by adopting the minimum security measures laid down in the technical specifications (Annex B).

**Data Communication:** Your data will be retained at our office and communicated only to those subjects who are entitled to fulfil services necessary to a correct management of our business relation, ensuring the full respect of the data subject's rights.

Your data will be processed only by personnel expressly authorized by the Data Controller and, in particular, by the following authorized subjects and entities:

- Administration Department
- General Manager
- Operational Department

Your data may be communicated to selected third parties including:

- Public and/or private entities to whom communication of personal data is mandatory or necessary to fulfil legal obligations, or necessary to manage our business relation
- Couriers, carriers, Post Office, logistic companies
- Consultants, professionals and professional associations
- Banks

**Data dissemination:** Your data will not be disseminated in any way.

**Data Controller:** The Data Controller for data processing is Start Promotion S.r.l. (via Mauro Macchi, 50, 20124, Milano (MI) ITALY; Ph. +39 02 67071383), in the person of its pro tempore legal representative.

You have the right to obtain from the Data Controller the erasure, communication, updating, rectification and integration of your personal data and, in general, you are entitled to all the rights set out by Section 7 of the Privacy Code, hereafter included .

Furthermore, any time you can access the updated version of the present policy by connecting to:  
<http://privacylab.it/informativa.php?07623196711>

## **Legislative Decree no. 196/2003, Section 7 – Right to access personal data and other rights**

1. A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him exist, regardless of their being already recorded, and communication of such data in intelligible form.
2. A data subject shall have the right to be informed
  - a) of the source of the personal data;
  - b) of the purposes and methods of the processing;
  - c) of the logic applied to the processing, if the latter is carried out with the help of electronic means;
  - d) of the identification data concerning data controller, data processors and the representative designated as per Section 5(2);
  - e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.
3. A data subject shall have the right to obtain
  - a) updating, rectification or, where interested therein, integration of data;
  - b) erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
  - c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.
4. A data subject shall have the right to object, in whole or in part,
  - a) on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
  - b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or for the performance of market or commercial communication surveys.