



**INFORMATION ON
THE PROCESSING OF
PERSONAL DATA**



**INFORMATION ON THE PROCESSING OF PERSONAL DATA
EMPLOYEES and COLLABORATORS**

Article 13 of Regulation (EU) No 2016/679.....pagina 3

**INFORMATION ON THE PROCESSING OF PERSONAL DATA
CUSTOMERS AND SUPPLIERS**

Article 13 of Regulation (EU) No 2016/679.....pagina 5

**INFORMATION ON THE PROCESSING OF PERSONAL DATA
CANDIDATES**

Article 13 of Regulation (EU) No 2016/679.....pagina 7



INFORMATION ON THE PROCESSING OF PERSONAL DATA
EMPLOYEES and COLLABORATORS
Article 13 of Regulation (EU) No 2016/679

ABERT S.p.A. (hereafter the "Company" or the "Data Controller"), with registered office in VIA DON PRIMO MAZZOLARI 17 25050 PASSIRANO (BS) Italy and VAT number 01418800171, as data controller, informs you that your personal data will be processed on the basis of the following rules.

1. Type of data processed

The Company will collect the following data:

Surname, First Name, Address and Province of Residence, Fiscal Code and other identification numbers, Date and Place of Birth, Telephone Number, Email Address
Educational background information, assignments and duties, employers
Data disclosing health, racial and ethnic origins, religious beliefs, political opinions and membership of trade unions and political parties
Video surveillance recordings

2. Purpose and legal basis of processing

The data you provide will be processed for the following purposes:

- fulfilling all obligations arising from the employment relationship, training and development, monitoring and security, disciplinary and grievance procedures and other general administrative and human resources processes.
- The legal basis for the processing is the contract itself (Art. 6(b) GDPR).
- Providing for the fulfilments prescribed by civil, tax, insurance, occupational health and safety law and for the performance in favour of the employee of the services to which he/she is entitled. In this case, the legal basis for the processing is the need to give effect to legal fulfilments envisaged as mandatory by applicable law (art. 6, lett. c, GDPR).

With regard to the 'special categories' of data referred to in Article 9 of the GDPR, they may be processed within the scope of the Controller's activity, to

- to establish suitability for certain tasks and jobs, as well as for surveillance and periodic health checks required by law (Legislative Decree 81/08);
- to make deductions and payments of association dues, both in relation to the possible assumption of trade union offices;
- the granting of permits and/or expectations for elective public offices;
- requesting the use of religious holidays provided for by law.

3. Method of Processing

Personal data will be processed by the Company by means of computerised, electronic, telematic and/or manual and paper-based tools in accordance with the principles of fairness, loyalty and transparency provided for by the applicable regulations applicable and protecting the confidentiality of the Data Subject, by means of technical and organisational security measures to ensure an adequate level of security.

4. Data retention

The Data provided by the Data Subject will be kept for as long as necessary to achieve the purposes for which they were collected and in compliance with any mandatory period required by law.



5. Communication, dissemination and transfer of Data

The data subject to processing may be communicated to the following entities:

- employees, collaborators and agents of ABERT S.p.a., duly authorised;
- professionals, accounting and tax service companies, trade associations, consultants, banking institutions, risk central, insurance companies, companies or training institutions;
- data processors specifically appointed in writing
- public and private entities, also following inspections or audits.

The data will not be disseminated, made public or transferred abroad in any way, unless the processing involves the transfer of data to companies in which the Data Controller has an interest and for which the European Commission has adopted adequacy decisions pursuant to Article 45 GDPR. They may be disclosed to the competent Authorities if required by current legislation, by orders of the Authority itself and/or at the request of legitimate subjects.

6. Profiling and automated decision-making processes

Your personal data will not be used for profiling purposes or to trigger automated decision-making processes.

7. Rights of the Data Subject

The Interested Party may:

- receive confirmation of the existence of the Data and access to their content (access rights);
- update, modify and/or correct the Data (right of rectification);
- request the deletion or limitation of Data processed unlawfully, including Data whose retention is unnecessary for the purposes for which the Data were collected or otherwise processed (right to be forgotten and right to limitation);
- object to the processing (right to object);
- file a complaint with the Supervisory Authority (Data Protection Authority www.garanteprivacy.it) in the event of a breach of data protection regulations;
- receive an electronic copy of the Data concerning him/her as a Data Subject, when such Data has been provided in the context of the contract and request that such Data be transmitted to another data controller (right to data portability).

We inform you that, in certain cases (cancellation, restriction, opposition), the exercise of your rights may prevent, in whole or in part, the continuation of the contractual relationship between you and the Company and the provision of benefits to you.

8. Contact

To exercise these rights and/or request information about the processing, the Data Subject may contact the Data Controller by sending a communication to the email address: privacy@abert.it. When contacting us, the Data Subject should make sure to include his/her name, email/postal address and/or telephone number(s), in order to ensure that his/her request can be handled properly.



INFORMATION ON THE PROCESSING OF PERSONAL DATA CUSTOMERS AND SUPPLIERS

Article 13 of Regulation (EU) No 2016/679

ABERT S.p.A. (hereafter the "Company" or the "Data Controller"), with registered office in VIA DON PRIMO MAZZOLARI 17 25050 PASSIRANO (BS) Italy and VAT number 01418800171, as data controller, informs you that your personal data will be processed on the basis of the following rules.

1. Type of data processed

The Company, as part of the contractual relationship with you or with the Institution for which you perform your activity, will collect the following data:

Surname, First Name, Address and Province of Residence, Fiscal Code and other identification numbers, Date and Place of Birth, Telephone Number, Email Address, Bank Details.
Video Surveillance Footage Recording

2. Purpose and legal basis of processing

The data you provide will be processed for the following purposes:

- in order to fulfil all obligations arising from the contract (customer and supplier management, after-sales service, quality management, business planning, customer satisfaction surveys). The legal basis for the processing is the contract itself (Art. 6, letter b, GDPR);
- to fulfil legal obligations related to the execution of the contract (by way of example: accounting and tax fulfilment, obligations imposed by current legislation). In this case, the legal basis of the processing is the need to give effect to legal obligations provided for, as mandatory by the law in force (art. 6, lett. c, GDPR);
- to prevent concrete dangers or specific crimes related to the violation of the areas and premises. In this case, the legal basis for the processing is the pursuit of a legitimate interest of the Data Controller (Art. 6, lett. f, GDPR);

3. Method of Processing

Personal data shall be processed by the Company by means of computerised, electronic, telematic and/or manual and paper-based tools, in accordance with the principles of fairness, loyalty and transparency provided for by the applicable legislation and protecting the confidentiality of the Data Subject by means of technical and organisational security measures, to ensure an adequate level of security.

4. Data retention

The Data provided by the Data Subject shall be retained as long as necessary, to achieve the purposes for which it was collected and in compliance with any mandatory period provided for by law.

5. Communication, dissemination and transfer of Data

The processed data may be communicated to the following subjects

- employees, collaborators and agents of ABERT S.p.A., duly authorised



- professionals, accounting and tax service companies, trade associations, consultants, banking institutions, risk central, insurance companies, shippers, carriers and in general companies dealing with logistics
- data processors specifically appointed in writing public
- private entities, also following inspections or audits.

The data will not be disseminated, made public or transferred abroad in any way, unless the processing involves the transfer of data to companies in which the Data Controller has an interest and for which the European Commission has adopted adequacy decisions pursuant to Article 45 GDPR.

The data may be communicated to the competent Authorities if required by the regulations in force, by orders of the Authority itself and/or at the request of legitimate subjects.

6. Profiling and automated decision-making processes

Your personal data will not be used for profiling purposes or to trigger automated decision-making processes.

7. Rights of the Data Subject

The Data Subject may:

- receive confirmation of the existence of the Data and access to its content (rights of access);
- update, modify and/or correct the Data (right of rectification);
- request the deletion or limitation of Data processed in violation of the law, including Data whose storage is not necessary in relation to the purposes for which the Data were collected or otherwise processed (right to be forgotten and right to limitation);
- object to the processing (right to object);
- to lodge a complaint with the Supervisory Authority (Data Protection Authority www.garanteprivacy.it) in the event of a breach of the rules on personal data protection;
- receive an electronic copy of the Data concerning him/her as a Data Subject, when such Data has been rendered in the context of the contract, and request that such Data be transmitted to another data controller (right to data portability).

You also have the right to request the deletion of your email address and/or the interruption of the sending of communications of a commercial nature made through that channel.

We inform you that, in some cases (cancellation, restriction, opposition), the exercise of your rights may prevent, in whole or in part, the provision of services to you.

8. Contact

To exercise these rights and/or request information about the processing, the Data Subject may contact the Data Controller by sending a communication to the following email address: privacy@abert.it

When contacting us, the Data Subject should ensure that he/she includes his/her name, email/postal address and/or telephone number(s) in order to be sure that his/her request can be handled properly.



INFORMATION ON THE PROCESSING OF PERSONAL DATA CANDIDATES

Article 13 of Regulation (EU) No 2016/679

ABERT S.p.A. (hereafter the "Company" or the "Data Controller"), with registered office in VIA DON PRIMO MAZZOLARI 17 25050 PASSIRANO (BS) Italy and VAT no. 01418800171, as data controller, informs you that your personal data will be processed on the basis of the following rules.

1. Type of data processed

The Company will collect the following data: Surname, First Name, Address and Province of Residence, Tax Code and other identification numbers, Date and Place of Birth, Telephone Number, Email Address
Information on educational background, assignments and duties, employers
Data disclosing health, racial and ethnic origins, religious beliefs and membership of trade unions and political parties
Video surveillance recordings

2. Purpose and legal basis of processing

The data you provide will be processed for the following purposes:

- Creating professional and candidate profiles.
The legal basis for the processing is the pursuit of a legitimate interest of the Data Controller (Art. 6(f) GDPR) in relation to the obligations under Art. 9(2)(b) GDPR;

3. Method of Processing

Personal data shall be processed by the Company by means of computerised, electronic, telematic and/or manual and paper-based tools, in accordance with the principles of fairness, loyalty and transparency provided for by the applicable legislation, and protecting the confidentiality of the Data Subject by means of technical and organisational security measures to ensure an adequate level of security.

4. Data retention

The Data provided by the Data Subject shall be retained for a period of time not exceeding 6 months, unless the Company has a specific interest in keeping them for a longer period, also in compliance with any compulsory period provided for by law.

5. Communication, dissemination and transfer of Data

The processed data may be communicated to the following subjects:

- employees, collaborators and agents of ABERT S.p.A., duly authorised
- professionals, accounting and tax service companies, trade associations, consultants, banking institutions, risk central, insurance companies
- data processors specifically appointed in writing public
- private entities, also following inspections or audits.



The data will not be disclosed, made public or transferred abroad in any way, unless the processing involves the transfer of data to companies in which the Data Controller has an interest and for which the European Commission has adopted adequacy decisions pursuant to Article 45 GDPR.

They may be disclosed to the competent Authorities if required by current legislation, by orders of the Authority itself and/or at the request of legitimate subjects.

6. Profiling and automated decision-making processes

Your personal data will not be used for profiling purposes or to trigger automated decision-making processes.

7. Rights of the Data Subject

The Data Subject may:

- receive confirmation of the existence of the Data and access to their content (rights of access);
- update, modify and/or correct the Data (right of rectification);
- request the deletion or limitation of Data processed in violation of the law, including Data whose storage is not necessary in relation to the purposes for which the Data were collected or otherwise processed (right to be forgotten and right to limitation);
- object to the processing (right to object);
- to lodge a complaint with the Supervisory Authority (Data Protection Authority www.garanteprivacy.it) in the event of a breach of the rules on personal data protection;
- receive an electronic copy of the Data concerning him/her as a Data Subject, when such Data has been rendered in the context of the contract, and request that such Data be transmitted to another data controller (right to data portability).

We inform you that, in certain cases (cancellation, restriction, opposition), the exercise of your rights may prevent, in whole or in part, the establishment of a contractual relationship between you and the Company.

8. Contact

To exercise these rights and/or request information about the processing, the Data Subject may contact the Data Controller by sending a communication to the email address: privacy@abert.it. When contacting us, the Data Subject should make sure to include his/her name, email/postal address and/or telephone number(s) to ensure that his/her request can be handled properly.

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