

[Agents, contact persons at agencies and representatives:](#)

Privacy policy on the processing of personal data pursuant to arts. 13-14 EU Regulation 2016/679

Data subjects: agents, contact persons at agencies and representatives.

COEM S.p.A. in its capacity as Data Controller of your personal data, pursuant to and by the effects of EU Regulation 2016/679, hereinafter the 'GDPR', hereby informs you that the above-cited regulation provides for the protection of data subjects with respect to the processing of personal data and that said processing shall be characterised by the principles of correctness, lawfulness, transparency and the protection of your confidentiality and your rights.

Your personal data will be processed in compliance with the legislative provisions of the above-cited regulation and with the confidentiality obligations provided for therein.

The purposes and the legal basis of the processing: specifically, your data shall be processed for the following purposes connected with fulfilling legislative obligations:

- tax and accounting obligations required by law;
- management of disputes;
- obligations provided for by current laws.

Your data will also be used for the following purposes relating to the execution of measures connected with contractual or pre-contractual obligations:

- after-sales assistance;
- management of agency contracts and related obligations, including pre-contractual activities;
- customer management;
- management of commissions;
- the sending of information concerning the company's promotional activities necessary for the promotion of the company's products;
- programming activities;
- customer invoicing records.

Your data will also be used for the following purposes necessary for pursuing the data controller's legitimate interests:

- internal security control service and legal obligations regarding corporate instruments.

With regards to the above-indicated purposes in which you are an employee-contact person of the Agency-legal entity, your data will be processed as a result of the need to interact with the Agency-legal entity through you.

Methods of processing. Your personal data may be processed in the following ways:

- by means of electronic calculators using computing devices managed by Third Parties;
- assignment of analysis operations to third parties;
- processing by means of electronic devices;
- manual processing using paper records.

Every processing activity occurs in compliance with the procedure pursuant to arts. 6 and 32 of the GDPR and through the adoption of appropriate prescribed security measures.

Your data will be processed only by staff expressly authorised by the Data Controller and, specifically, by the following groups of staff:

- General Management;
- Administration Office;
- Sales Office;
- Marketing Office.

Communication: Your data may be communicated to external individuals and legal entities for a correct management of the relationship and specifically in the following categories of Recipients operating in their capacity as External Data Processor or Autonomous Data Controller:

- banks and credit institutes;
- customers and/or contact persons at customer companies and/or potential customers for purposes associated with work activities;
- consultants and freelance workers, also operating as a partnership;
- in the context of public and/or private individuals or entities for which the communication of the data is mandatory or necessary in fulfilment of legal obligations or, in any case useful for managing the relationship;
- suppliers of external services necessary for the management of electronic invoicing;
- external suppliers necessary for the performance of the relationship in force (e.g., companies that provide hardware or software or cloud services);
- constitutional bodies or bodies of constitutional significance;
- shippers, transporters, own drivers, Postal service, Logistics companies.

Dissemination: Your personal data will not be disseminated in any way.

Your personal data may also be transferred, within the limits of the above-described purposes, to the following states:

- for technical and/or organisational requirements, to member states of the European Union.

Period of Storage. We hereby inform you that, in compliance with the principles of lawfulness, limitation of purposes and the minimisation of data, pursuant to art. 5 of the GDPR, the period of storage of your data is:

- with reference to the purpose of internal security control, established as for a period of time not greater than the time required to complete the services provided;
- established as for a period of time not exceeding the achievement of the purposes for which the data have been collected and processed for the completion of the contractual purposes;
- established for a period of time not exceeding the achievement of the purposes for which the data have been collected and processed and in compliance with the obligatory timeframes prescribed by law.

Data Controller: in accordance with the law, the Data Controller is COEM S.p.A. (Via Cameazzo 25 , 41042 Fiorano Modenese (MO); VAT no.: 01927780369; contactable at the following addresses: E-mail: privacy.coem@coem.it; Telephone: 0536 993511) in the person of its pro-tempore legal representative.

You have the right to obtain from the data controller the erasure (right to be forgotten), limitation, updating, rectification, portability, opposition to the processing of personal data regarding you, as well as, in general, to exercise all the rights provided for by arts. 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR by writing to privacy@coem.it. You can also make a claim to the competent control body if you consider that the processing of your data is contrary to current law.

You can also examine the updated version of this policy at any time, connecting to the internet address <https://www.privacylab.it/informativa.php?07369181913>.

Reg. EU 2016/679: Arts. 15, 16, 17, 18, 19, 20, 21 and 22 – Rights of the data subject

1. The data subject has the right to obtain confirmation of the existence or not of personal data relating to them, also if not yet registered, their communication in legible form and the possibility of making a claim to the control Body (Italian Data Protection Agency).

2. The data subject has the right to obtain indication:

- a. of the origin of the personal data;
- b. of the purposes and methods of processing;
- c. of the logic applied in the event of processing carried out with the use of electronic instruments;
- d. of the general details of the data controller, of the data processors and of the designated representative pursuant to article 5, paragraph 2;
- e. of the individuals or legal entities or categories of individuals or legal entities to which personal data may be communicated or which they may gain knowledge of in their capacity as designated representative in the national territory, of data processors or persons in charge of processing.

3. The data subject has the right to obtain:

- a. the updating, rectification or, when of interest, integration of the data;
- b. the erasure, transformation into anonymous form or the blocking of data processed in breach of the law, including those for which storage is not necessary in relation to the purposes for which the data have been collected or subsequently processed;
- c. certification that the operations as per letters a) and b) have been brought to the attention, also with regards to their content, to those to which the data have been communicated or disclosed, with the exception of cases in which said fulfilment is impossible or involves a clearly disproportionate use of resources with respect to the protected right;
- d. the portability of the data.

4. The data subject has the right to oppose, in whole or in part:

- a. for legitimate reasons to the processing of personal data relating to them, although pertinent to the purpose of collection;
- b. to the processing of personal data that relate to them for the purpose of the sending of advertising material or of direct sales or for the carrying out of market research or commercial communications.