AVS ELECTRONICS S.p.A.
a Socio Unico
Via Valsugana, 63 – 35010 Curtarolo (PD) Italy
Tel. 049 96 98 411 r.a. Fax 049 96 98 407
PEC: ammin.avs@legalmail.it
www.avselectronics.com - avs@avselectronics.it
Cap. Soc. €. 800.000,00 i.v.
Reg. Imprese PD 00381050285
R.E.A. Padova n. 121975
CF/P.IVA 00381050285

Sistema di Gestione Azienda certificato: ISO 9001:2015
Sistema di Gestione Sicurezza lavoratori certificato: ISO 45001:2018

PRIVACY NOTICE

Art. 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016

Under Article 13 of the General Data Protection Regulation – Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "**GDPR**"), it is our responsibility to provide you with certain information about the processing of personal data supplied in connection with your relationship with AVS ELECTRONICS S.p.A.

Data Controller
The Data Controller is AVS ELECTRONICS S.p.A., headquarter at Curtarolo (PD), Via Valsugana n. 63, tax code and PD Companies Register number: 00381050285, e-mail: privacy@avselectronics.it (hereinafter "**Data Controller**" or "**Company**").
Data Protection Officer (hereafter "RPD" or "DPO")
The contact data for the DPO is available on the Data Controller's web site www.avselectronics.com or from the registered offices. In order to exercise your rights and for all communications, problems and/or requests for clarifications regarding the protection of your personal data, you may freely contact the DPO.

Purposes for which your consent is not required

Purpose	**Legal basis for the processing**
To manage the archiving and retention of data, information, communications, including electronic communications, and documents relating to the relationship with the Company (electronic communications may include tracking pixels for security and authentication purposes, aggregated and anonymous statistics, and the delivery of mandatory corporate or service-related messages).	(Art. 6(1) c), GDPR) Processing necessary to fulfil a legal obligation of the Data Controller (Art. 6(1) f), GDPR) Processing necessary to pursue a legitimate interest of the Data Controller in relation to the organisation and administration of its business.

Purposes for which your consent is required

Purpose	**Legal basis for the processing**
Statistical, commercial, promotional and marketing activities, including providing information about new products, offers and services through printed or digital materials, newsletters, electronic messages, and invitations to events organised or sponsored by the Company. Electronic communications may include tracking technologies (such as tracking pixels) to measure email open rates and recipient engagement with the emails sent.	(Art. 6(1) a), GDPR) Consent (Article 122 of the Italian Data Protection Code) Consent of the Data Subject
Market research. Electronic communications may include tracking technologies (such as tracking pixels) to measure email open rates and recipient engagement with the emails sent.	(Art. 6(1) a), GDPR) Consent (Article 122 of the Italian Data Protection Code) Consent of the Data Subject

AVS ELECTRONICS S.p.A.
a Socio Unico
Via Valsugana, 63 – 35010 Curtarolo (PD) Italy
Tel. 049 96 98 411 r.a. Fax 049 96 98 407
PEC: ammin.avs@legalmail.it
www.avselectronics.com - avs@avselectronics.it
Cap. Soc. €. 800.000,00 i.v.
Reg. Imprese PD 00381050285
R.E.A. Padova n. 121975
CF/P.IVA 00381050285

Recipients of Personal Data

For the purposes outlined above, your personal data may be disclosed to the following recipients:

Third parties or categories	Purpose
IT Companies	Management, maintenance and updating of the systems and software used by the Data Controller.
Providers of networks, electronic communication services, and IT and electronic data storage, retention and management services	Hosting, housing, cloud, SaaS and other remote IT services essential for the provision of the Data Controller's activities; compliant electronic document archiving and retention services.
Communication and marketing service providers	Communication and marketing activities
Consultants, professionals, law firms, arbitrators, insurance companies, loss adjusters and brokers	Judicial and extrajudicial activities; insurance-related activities in the event of claims; organisational, administrative, financial and accounting management.

Third parties to whom your personal data may be disclosed act as:

- **Data Controllers**, i.e. entities that determine the purposes and means of processing personal data;
- **Data Processors**, i.e. entities that process personal data on behalf of the Data Controller;
- **Joint Controllers**, which jointly determine the purposes and mean of processing with the Company.

The list of entities designated as Data Controllers or Data Processors, together with the relevant up-to-date information, is available from the Company.
The processing of data by certain third parties may involve the transfer of data to countries outside the European Union (EU). In such cases, we will ensure that the data are adequately and appropriately protected in compliance with the GDPR.

Personal Data Retention Period

The retention periods for personal data, or, where it is not possible to specify them, the criteria used to determine such periods, are set out below.

Personal data and documents	Retention period or criteria used to determine it
Personal identification and contact details	For as long as necessary to achieve the purposes of processing and, in any event, for no longer than 24 months.
Personal identification data and documents relating to the relationship with the Company	For the duration of the relationship and thereafter, to the extent permitted by law, for administrative, accounting and tax purposes, as well as to establish, exercise or defend the Controller's rights, where necessary.

Email measurement and tracking (opens, IP address, device, timestamp)	For as long as necessary to achieve the purposes of processing and, in any event, for no longer than 24 months. The data subject may disable tracking while continuing to receive emails from the Data Controller, without any restriction of the service. Data required for mandatory corporate or service-related communications may be retained for the period prescribed by applicable law and, where necessary, until the expiry of the relevant limitation periods.

Recipients of Personal Data

For the purposes outlined above, your personal data may be disclosed to the following recipients:

- The Controller's employees and/or collaborators who have been duly appointed as authorized persons and provided with appropriate instructions on how to process such data;
- Other companies within the Riello Elettronica Group, for the management of specific functions and/or the provision of services;
- Third parties other than the Controller, such as:

Data Subject Rights

We hereby inform you that the GDPR grants you certain rights concerning your personal data and the related processing, which you may exercise by contacting the Data Controller.
These rights include: the right to withdraw consent for processing activities for which consent is required, without affecting the lawfulness of processing based on consent before its withdrawal (Article 13(2)(c)); the right of access (Article 15); the right to rectification (Article 16); the right to erasure (Article 17); the right to restriction of processing (Article 18); the right to data portability (Article 20); the right to object (Article 21); and the right to lodge a complaint with the Supervisory Authority (Article 77).
To exercise your rights, you may send a communication to **privacy@avselectronics.it**.
If you believe that the processing of your personal data infringes the provisions of the GDPR, you have the right to lodge a complaint with the Supervisory Authority (Article 77 GDPR).
The exercise of the rights is subject to the limitations, rules and procedures laid down in the GDPR, which the data subject must be aware of and comply with. In accordance with Article 12(3), the Data Controller shall provide the data subject with information on the action taken without undue delay and, in any event, within one month of receiving the request. This period may be extended by a further two months where necessary, considering the complexity and number of requests. The Data Controller shall inform the data subject of any such extension and the reasons for the delay within one month of receiving the request.

Other Information

The personal data provided may be processed by the Data Controller with or without the use of electronic or IT tools.
Please also note that providing your personal data for the mandatory purposes indicated above is a legal or contractual obligation or a requirement necessary for the performance of contractual obligations. You are therefore required to provide such personal data, as failure to do so will make it impossible to manage the relationship with the Company.

Amendments and Updates

This Privacy Notice may be amended and/or supplemented, including because of the applicability of the GDPR and any future legislative amendments and/or updates.
The updated Privacy Notice is always available on the Data Controller's website.