Privacy policy for customers and suppliers, even potential ones and other contacts for business communications

Articles. 13-14 of the EU Reg. 2016/679

This information is a general obligation that must be fulfilled before or at the latest when start collecting personal data. In the case of personal data not collected directly from the data subject, the information must be provided within a reasonable time, or at the time of communication (not registration) of the data (to third parties or to the data subject). In accordance with the General Regulations for the Protection of Personal Data of Individuals (GDPR - Reg. (EU) 2016/679), the undersigned organization, data controller, informs of the following:

The personal data held by the undersigned organization are collected directly from the data subjects and directly and freely provided by them and from third parties (e.g. on the Internet, from public registers, etc.).

This information concerns personal data, contact details, telephone numbers, postal addresses and emails. The data subjects are to be considered as identified and identifiable third parties with the writer or with a potential contractual counterpart, such as for example. customers, suppliers, partners, public administrations, associations, etc. with which there are reports of interest and/or work with the writer.

Personal data are processed for the communication between the writing organization, including its staff, and the person concerned in the normal activity carried out according to the following purposes (for each of which the legal basis is indicated in brackets by reference to the articles of the GDPR):

a) purposes strictly connected to the execution and implementation of the services requested (GDPR art.6 (b) and 9 (a)), in particular for the management of customers and suppliers, even potential ones, carried out through insertion in the databases company for the purposes of evasion of regulatory and contractual obligations, internal organization of work, statistics and others in any case connected to the economic activity of the undersigned organization, e.g. the obligations related to civil, fiscal, accounting, remuneration, social security, insurance, etc., including the sending of circulars and announcements related to the activity of the contract for the provision of the services requested;

b) purposes connected to obligations established by law, as well as provisions issued by authorities legitimated by the law (GDPR articles 6 (c) and 9 (b, g, h)).

The provision of data collected from the data subject is optional but essential for the purpose of processing them for the purposes in letters a) and b). In the event that the parties do not communicate their indispensable data, it will not be possible to exchange communications between the staff of the writer and the data subject. For all non-essential data, conferment is optional.

In the absence of consent or incomplete or incorrect conferment of certain data, including sensitive data, the required obligations may be so incomplete as to cause injury or in terms of penalties or loss of benefits, and due to the impossibility of ensuring the adequacy of the processing same to the obligations for which it is performed, and for the possible mismatch of the results of the treatment itself to the obligations imposed by the law to which it is addressed, intending to exonerate the writing organization from any and all liability for any penalties or measures afflicting.

Data processing means the collection, recording, organization, storage, processing, modification, cancellation and destruction or the combination of two or more of these operations. In relation to the aforementioned purposes, the processing of personal data takes place on paper and by manual, computerized and telematic tools, including automated, to store and manage the data, with logic strictly related to the purposes themselves and, in any case, to ensure the security and confidentiality; personal data will therefore be processed in compliance with the methods indicated in art. 5 EU Reg. 2016/679, which provides, inter alia, that the data are processed lawfully and fairly, collected and recorded for specific, explicit and legitimate, exact, and if necessary updated, relevant, complete and not excessive in relation to the purposes of the processing, respecting the fundamental rights and freedoms, as well as the dignity of the person concerned, with particular reference to privacy and personal identity, through measures of protection and
security. The undersigned organization has prepared and will further improve the security system for accessing and storing data.

There is no automated decision-making process (e.g. for profiling).

**EXTRA EU TRANSFERS**

The treatment will take place mainly in Italy and the EU, but it could also take place in non-EU and non-EEA countries if considered functional to the efficient fulfillment of the objectives pursued in compliance with the guarantees in favor of the data subjects.

The personal data will be kept, in general, as long as the purposes of the processing continue: they will be kept for the entire duration of the contractual relationship and, after its conclusion, until the end of the legal prescription provided the relationship is not renewed again.

**CONSERVATION PERIOD**

The treatment will take place mainly in Italy and the EU, but it could also take place in non-EU and non-EEA countries if considered functional to the efficient fulfillment of the objectives pursued in compliance with the guarantees in favor of the data subjects.

The personal data will be kept, in general, as long as the purposes of the processing continue: they will be kept for the entire duration of the contractual relationship and, after its conclusion, until the end of the legal prescription provided the relationship is not renewed again.

**CATEGORIES OF ADDRESSEES**

Data will not be disseminated unless otherwise provided by law.

Moreover, without the prior general consent of the data subject to communications to third parties, it will be possible to run exclusively services that do not provide such communications. In case of necessity specific and precise consents will be required and the subjects who will receive the data will use them as autonomous data controllers.

**RIGHTS OF THE INTERESTED**

At any time you can: exercise your rights (access, rectification, cancellation, limitation, portability, opposition, absence of automated decision-making processes) when provided to the data controller, pursuant to art. from 15 to 22 of the GDPR (https://eur-lex.europa.eu/legal-content/en/TXT/?uri=celex%3A32016R0679); propose a claim to the Control Authority (www.garanteprivacy.it); if the treatment is based on consent, revoke the consent given, taking into account that the withdrawal of consent does not affect the lawfulness of the treatment based on consent before revocation.

The data controller is Fondazione Links

The headquarters is in Via Pier Carlo Boggio 61 - 10138 Torino

The contact details are: telephone 011-2276150; e-mail info@linksfoundation.com