I.T.A. s. p. a.
Industria Trafilati Acciai
Amministrazione e Stabilimenti:
Via Lago Vecchio 9/20
23801 Calolziocorte (LC) Italia

ISO 9001 Quality System
ISO 14001 Environmental Management System

PRIVACY – CLIENTS
Information notice pursuant to Article 13 Regulation (EU) 2016/679 (GDPR)



WHY THIS INFORMATION
1. WHO IS THE DATA CONTROLLER? HOW CAN YOU CONTACT HIM?
The **DATA CONTROLLER**, pursuant to artt. 4 and 24 of Reg. EU 2016/679, is **I.T.A. S.P.A.**, with registered office in 23900 – Lecco (LC), Piazza Giuseppe Mazzini n. 13 and operative office in 23801 – Calolziocorte (LC), Via Lago Vecchio n. 9/20, in the person of its pro-tempore legal representative. The Data Controller's contact detail is e-mail privacy.ita@steelgroup.com.



2. PERSONAL DATA PROCESSED
Personal Data: (Definition) any information concerning an identified or identifiable natural person (data subject). An identifiable person is a natural person who can be identified directly or indirectly with particular reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more features of his or her physical, physiological, genetic, mental, economic, cultural or social identity – art. 4, c. 1, n. 1 GDPR.
Categories of Personal Data processed: i) personal details, contact data and the role held at the company of which the data subject belongs; ii) company name and tax code; iii) additional personal data that may be collected during the negotiation and/or conclusion and/or termination of the contractual relationship

3. PURPOSE OF PROCESSING, LEGAL BASE, DATA RETENTION PERIOD, NATURE OF PROVISION

PURPOSE OF PROCESSING	LEGAL BASE	DATA RETENTION PERIOD	NATURE OF PROVISION
A) Fulfilment of contractual obligations, and administrative, financial and legal purposes related to the establishment, execution and termination of the contractual relationship	The processing is necessary for the performance of a contract to which the data subject is party (C44) Art. 6 par. 1 lett. b) GDPR	10 anni Article 2220 Italian Civil Code, except for contractual and non-contractual issues that may arise and unless otherwise required by law	The provision of personal data is necessary for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the request of the data subject
B) Asserting and defending one's rights, including in the context of debt collection procedures against the person concerned or	The processing is necessary for the purposes of the legitimate interests	10 years, subject to opposition and subject to the time necessary for the legal defence	The provision of data is necessary and the refusal must be balanced against the legitimate interest of

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Tel (+39) 0341.634.742 - Fax (+39) 0341.634.704 (Comm.) - Fax (+39) 0341.634.962 (Amm.) - E-mail: ita@steelgroup.com - Website: www.steelgroup.com
Società con Unico Socio, soggetta a Direzione e Coordinamento di Steelgroup Italy Holding S.r.l.

La corrispondenza e le fatture sono da intestare ed inviare al solo indirizzo di Calolziocorte. Questa comunicazione ed ogni suo allegato sono da considerarsi confidenziali e riservati ad esclusivo uso del destinatario. Qualora abbiate ricevuto questa comunicazione per errore, Vi invitiamo a contattarci ai numeri sopra indicati.

PURPOSE OF PROCESSING	LEGAL BASE	DATA RETENTION PERIOD	NATURE OF PROVISION
a third party in any litigation	pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data (C47-C50) Art. 6 par. 1 lett. f) GDPR		the Data Controller set out in the purposes of this point
C) Management control aimed at guiding the management towards the achievement of the objectives established in the operational planning, detecting, through the measurement of specific indicators, the deviation between planned objectives and achieved results and informing the responsible bodies of such deviations, so that they can decide and implement the appropriate corrective actions	The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data (C47-C50) Art. 6 par. 1 lett. f) GDPR	10 years, subject to opposition	The provision of data is necessary and the refusal must be balanced against the legitimate interest of the Data Controller set out in the purposes of this point
D) Handling of your or other data subjects' requests, pursuant to Art. 15 et seq. of the GDPR (data subject rights)	The processing is necessary for compliance with a legal obligation to which the controller is subject (C45) Art. 6 par. 1 lett. c) GDPR	5 years from the closing of the application, unless litigation	The provision of personal data is necessary, as it is indispensable to be able to fulfil legal obligations
E) Management of the information flows provided for by the Organisation, Management and Control Model (MOGC) adopted pursuant to D.lgs. n. 231/2001 and aimed at preventing the liability of entities	The processing is necessary for compliance with a legal obligation to which the controller is subject (C45)	Maximum 10 years from the time the OdV receives the information flows required by the MOGC	The provision of personal data is necessary, as it is indispensable to be able to fulfil legal obligations

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PURPOSE OF PROCESSING	LEGAL BASE	DATA RETENTION PERIOD	NATURE OF PROVISION
for administrative offences dependent on crime. In particular, the data will be collected in order to enable the OdV to monitor the functioning of and compliance with the MOGC	Art. 6 par. 1 lett. c) GDPR		
F) Verify the security and commercial reliability of the Data Controller's clients	The processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data (C47-C50) Art. 6 par. 1 lett. f) GDPR	Throughout the operation	The provision of data is not compulsory and the data subject may object to the processing

4. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE DATA

The personal data provided will be communicated to employees or collaborators of the Data Controller who will process the data as authorised persons acting under the authority of the Data Controller (Art. 29 GDPR). In order to fulfil existing contracts with the Company or for related purposes, the personal data provided may be disclosed to recipients belonging to the following categories: - Group Companies; - subjects that provide services for the management of the information system used by the Data Controller and telecommunications networks (including e-mail and the website); - firms or companies in the context of assistance and consultancy relations; - subjects with whom the Data Controller has concluded economic agreements;- firms or companies in the context of tax assistance and consultancy and administrative/accounting management relations; - competent authorities to fulfil legal obligations and/or provisions of public bodies, upon request; - company transferees, companies resulting from possible mergers, demergers or other transformation of the Data Controller - as autonomous data controllers.

The subjects belonging to the above-mentioned categories perform the function of data processor or operate completely independently as separate data controllers. The list of any data processors is constantly updated and available at the Data Controller's head office.

5. IS THERE A DATA TRANSFER TO A THIRD COUNTRY?

The personal data will not be transferred to non-EEA countries.

6. IS THERE AN AUTOMATED PROCESS?

We do not use decision-making processes based on automatic processing, including profiling.

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	7. DATA SUBJECTS' RIGHTS You may assert your rights as expressed in Artt. 15 et seq. GDPR, by contacting the Data Controller at the e-mail at the contacts listed above. You have the right, at any time, to request access to your personal data (Art. 15), rectification (Art. 16), deletion of the same (Art. 17), restriction of processing (Art. 18). The Data Controller shall inform (Art. 19) each of the recipients to whom the personal data have been transmitted of any rectification or erasure or restriction of processing carried out. The Data Controller shall inform the data subject of these recipients if the data subject so requests. In the cases provided for, you have the right to the portability of your data (Art. 20), in which case they will be provided to you in a structured, commonly used and machine-readable format. You have the right to object (Art. 21), at any time, to the processing of your data based on legitimate interest by writing to the contact details above with the subject "objection". In the event that he/she considers that the processing of personal data carried out by the Data Controller is in breach of the provisions of Regulation (EU) 2016/679, the data subject has the right to lodge a complaint with the Supervisory Authority, in particular in the Member State where he/she normally resides or works or in the place where the alleged breach of the Regulation occurred (Garante Privacy https://www.garanteprivacy.it/), or to take appropriate legal action.
	8. NOTICE CHANGES The Data Controller may change, modify, add or remove any part of this Privacy Policy at any time, unless it is necessary to obtain your consent where required. In order to facilitate the verification of any changes, the notice will contain an indication of the date on which the notice was updated.

Date of review: 21st December 2022

The Data Controller

I.T.A. S.p.A.
con Socio Unico

ITA S.P.A.

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