

	INFORMATION FOR THE PROCESSING OF PERSONAL DATA	GDPRM-AII.1
	and signature of the interested party GDPR 679/16, D. Lgs. 196/03 e D. Lgs. 101/18	Rev. 0 del 21/01/2021

Vitrum Design srl guarantees the safety and protection of personal data and their regulation according to the contents of this privacy statement.

This information is provided pursuant to Legislative Decree 196/2003, Legislative Decree 101/18 and articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, concerning the protection of individuals with regard to the processing of personal data (for brevity GDPR 2016/679).

1. Owner and managers of the treatment - art. 13 co. 1 lett. [a] [b] GDPR 2016/679

The data controller is Vitrum Design srl, Via Filippo Brunelleschi, 16 20146 Milan (MI) - email info@vitrumdesign.com to which you can contact to exercise the rights recognized by the GDPR and to know the updated list of all the Managers of the data processing and their contact details.

Vitrum Design srl also has a company DPO appointed in the person of Dr. Anna Dondana, e-mail address: a.dondana@gmail.com

2. Type of data processed

The Data Controller may process the categories of data of the interested parties listed below within its business processes:

a) Visitors to the website: they can enter their contact details (email address) if they want to be updated on the news introduced by the company by signing up for a newsletter; this is done by entering your email in the appropriate field and then sending your email address via the SIGN UP button; similar procedure should they wish to receive information in the section of the site dedicated to open careers ("Career"). To be contacted, however, the "CONTACTS" area authorizes the opening of its mail program and sending an email from the visitor's address to info@vitrumdesign.com. This category of interested parties responds exclusively to Art. 14 of the GDPR;

b) Customers: provide the Data Controller with the contact details of their contacts (name, surname, type of qualification at the client company, email and telephone contacts and address of their office), they can release their data through the website ("CONTACTS" area and subsequent sending of an email to info@vitrumdesign.com), or provide your business card and / or their data during fairs and conferences or dedicated meetings;

c) Owners of client companies and self-employed workers: provide the Data Controller with their identification data (name, surname, place and date of birth, residential address, social security number, copy of an identity document, e-mail contacts and telephone numbers). These data are requested by the Data Controller before signing the contract, in compliance with the anti-money laundering legislation.

d) Suppliers of products or services: they provide the Data Controller with the contact details of their contacts (name, surname, type of qualification at the client company, email and telephone contacts and address of their office), they can release their data via the website ("CONTACTS" area and

subsequent sending of an email to info@vitrumdesign.com), or provide your business card and / or your data at fairs and conferences or dedicated meetings;

e) Procurement suppliers: provide the Data Controller with the contact details of the contact persons and the data relating to the obligations pursuant to Art. 26 of Legislative Decree 81/08 of all workers who go to the client's sites (contact details, hiring data, training, health suitability, identification card and specific operational details);

f) Employees and collaborators: the processing of employee and collaborator data is governed by specific information with attached consent available in the company Privacy archives and for which it is necessary to contact the contacts indicated in point 1 of this document.

g) Sole proprietorships (customers or suppliers): in the event that the customer or supplier is configured as an Individual Firm, it will be necessary to process the bank and residence / domicile data in addition to the data mentioned above.

h) Other categories: any other categories of interested parties will be treated with separate information.

3. Purpose and legal basis of the processing - art. 13 e 14 co. 1 lett. [c] GDPR 2016/679

The purposes and legal bases of the processing of the categories of data subjects listed in the previous paragraph from a) to g) are as follows.

a) To be contacted by Vitrum Design srl and to be able to argue the reasons that prompted the interested party to enter their data on the website both on "Contacts" and on "Career" and on the basis of explicit consent or to periodically receive a newsletter on their own mailbox ("SUBSCRIBE: stay updated on Vitrum news" area).

b), d) e g): For the execution of a contract of which the interested party is a party or for the execution of pre-contractual measures adopted at the request of the same.

c) To fulfill a legal obligation to which the data controller is subject (European Anti-Money Laundering Directive);

e) For the execution of a contract of which the interested party is a party or for the execution of pre-contractual measures adopted at the request of the same as well as to fulfill the legal obligations of Occupational Health and Safety to which the Owner and the contractor are subject.

f) To fulfill the contractual and legal obligations related to the employment relationship and the health and safety of workers and on the basis of explicit consent.

Further treatments are envisaged that are based on the legitimate interests pursued by the data controller which are described in the final part of this document in the paragraph "Video surveillance".

4. Origin of the data entered on the "Contacts" and "Career" site– art 14 co. 2 lett. [f] GDPR 2016/679

The data indicated above - or part of them - will be collected at the time of registration on the website in the space called "Contacts", in the "Career" space or in the "Subscribe" space. They are therefore provided directly by the interested party and do not come from sources accessible to the public.

5. Communication and dissemination of data - artt. 13 e 14 co. 1 lett. [e] [f] GDPR 2016/679

All the above information can be transmitted, without further need for consent, to companies and external consultants functional to the performance of the contractual relationship, in accordance with the applicable regulations, such as lawyers, accountants, notaries, technical consultants etc.

It is possible to know the complete list of recipients above by sending a specific request to the contacts indicated in point 1.

If personal data are disclosed, such disclosure will be anticipated by the prior acquisition of a specific consent.

6. Control, storage of data and duration of their conservation - artt. 13 e 14 co. 2 lett. [a] GDPR 2016/679

The processing of personal data consists in the collection, registration, organization, storage and possible communication of the same data to third parties as described in point 5.

The processing of personal data of categories b), c), d), f) of point 2 is carried out in compliance with the provisions of Article 5 of the European Regulation on the processing of personal data, on:

- paper support: contact details, business cards, data on invoices, contracts, and more generally documents relating to contractual management activities (corporate documents that possibly may contain contact details of referents or owners of sole proprietors);
- IT support: contact details, business cards, data on invoices, contracts and more generally documents relating to contractual management activities (corporate documents that possibly may contain contact details of representatives or owners of sole proprietors)

in compliance with the rules of lawfulness, legitimacy, confidentiality and security provided for by current legislation.

More generally, the files relating to the data subjects referred to in letters a) -f) of point 2 are stored on the company server, accessible only to those authorized to access the server and to those authorized to process, as well as internal and external managers (Ref. Complete list available to the contacts referred to in point 1) who are therefore required to have access to information only for legitimate purposes, linked to the nature of their work.

The paper documentation, if any, is stored in locked cabinets located in the office section, therefore accessible only by Vitrum Design srl personnel.

The databases of Vitrum Design srl have systems that guarantee protection from both unauthorized access and other external factors that could cause damage to personal data. The data access requirements are regulated, and access is granted only to those who pursue authorized and lawful processing purposes.

Suitable and appropriate training is provided to all employees who can access personal information, while the relationship with outsiders is managed by a specific contract regarding the processing of personal data.

The period for which personal information will be kept will depend on the duration of the relationship. The retention period could in any case be longer than the contractual period, based on legislative obligations or the need to manage any complaints or non-conformities that may arise even after the closure of the relationship..

7. Transfer of personal data abroad

Personal information may not be transferred, stored or processed in locations outside Italy and the European economic area.

8. Rights of the interested party - art. 13 co. 2 lett. [b] [c] [d] GDPR 2016/679 e art. 14 co. 2 lett. [c] [d] [e] GDPR 2016/679

The interested party has the right to withdraw consent, obtain access to personal data and their updating or correction. The interested party for legitimate reasons has the right to obtain the cancellation of the same or the limitation of the processing that concerns them, the portability of the data or to oppose their treatment. Finally, the interested party has the right to request the transformation of data into anonymous form. To exercise his rights, the interested party must contact the Data Controller or the company DPO using the contacts indicated in point 1.

The interested party can also always contact the Guarantor Authority for the protection of personal data.

9. Nature of the provision of personal data and consequences of a refusal to respond

The provision of personal data is optional, but any refusal to provide them makes it impossible to establish the contractual or work relationship or the response to the contact request.

10. Other indications - art. 13 co. 2 lett. [f] GDPR 2016/679 and art. 14 co. 2 lett. [g] GDPR 2016/679

Finally, with regard to the personal data of the interested parties, there is no automated decision-making process, nor a treatment that involves profiling.

It is not the intention of the Data Controller to disseminate the personal data of the interested parties, nor to transmit them to third parties for purposes other than those expressly indicated in this statement..

INFORMATION FOR THE PROCESSING OF PERSONAL DATA FOR VIDEO SURVEILLANCE SYSTEMS

(pursuant to art. 4 of Law no. 300/1970e s.m.i. and to art. 13 of GDPR 679/2016 and of D.Lgs. 196/2003)

1. Introduction

The undersigned informs that video surveillance equipment has been installed at the company headquarters, in compliance with the provisions of law no. 300 of May 20, 1970 "Workers' Statute", of Regulation 679/2016 GDPR as well as the General Provision on video surveillance of April 8, 2010 adopted by the Guarantor for the protection of personal data.

2. Purpose of the treatment - art. 13 co. 1 letter [c] [d] GDPR 2016/679

The video surveillance system installed, provides for monitoring by means of video cameras installed at the entrances of the headquarters, with relative recording in the terms established by the current privacy regulations.

The video cameras are all visible and signaled by means of special signs.

The personal data collected and processed through the video surveillance system are the images of people and things that occasionally find themselves in transit within its range of action.

These data are collected and processed exclusively for the pursuit of the purposes of protecting the company assets with respect to possible damage, unauthorized entry, theft and robbery..

3. Processing methods - art. 13 co. 2 lett. [a] GDPR 2016/679

The collection and processing of data takes place in compliance with the principles of necessity, correctness, relevance and non-excess in relation to the aforementioned purposes of protecting corporate assets. The checks on the recorded data are carried out exclusively in the event of theft and alarm signaling, by viewing the recordings with the presence of the Public Security Bodies.

Specifically, the images collected are treated in such a way as to guarantee their safety and at the same time protect the rights, personal freedoms, dignity and maximum confidentiality of the data subjects.

The images are recorded and stored for a maximum of 48 hours, after which they are deleted, except for special extension needs related to holidays or closure of offices or buildings or in case it is necessary to adhere to a specific investigative request of the judicial authority or of the Judicial Police.

4. Categories of subjects to whom the data can be communicated or who can learn about them as managers or agents - art. 13 co. 1 letter [e] [f] GDPR 2016/679

The data collected will not be disclosed, sold or exchanged with third parties, except for use in the event of crimes committed against the company; in this case, the images will in fact be made available to the competent authority who will be called on the spot.

5. Rights of the interested party - art. 13 co. 2 lett. [b] [c] [d] GDPR 2016/679

Identifiable interested parties are recognized the rights referred to in Articles 15 - 21 of Regulation 679/2016 and, in particular, the right to access the data concerning them and to verify the purposes, methods and logic of their processing. With reference to the recorded images, the right to update, correct or integrate them cannot be practically exercised; conversely, the interested party has the right to obtain the blocking of data if they are processed in violation of the law.