



PRIVACY POLICY

pursuant to Regulation (EU) 2016/679 on the protection of personal data



1. DATA CONTROLLER AND DATA PROTECTION OFFICER

	<p>Pursuant to EU Regulation 2016/679 (hereinafter, "GDPR"), Abaco Spa with registered office in Piazza Vilfredo Pareto 9, 46100 Mantova, P.IVA 01588630200, PEC: abaco.mantova@pec.it, in its capacity as data controller (hereinafter, "Abaco" or the "Company"), wishes to inform you, pursuant to Art. 13 of the GDPR, that the data concerning you may be processed.</p>
	<p>Abaco can be contacted at the following e-mail address for matters related to the processing of your data: privacy@abacogroup.eu</p> <p>Data protection officer</p> <p>Abaco has appointed a Data Protection Officer (DPO) who can be contacted at the following e-mail address: dpo-abaco@abacogroup.eu</p>


2. SOURCE OF PERSONAL DATA AND CATEGORIES OF PERSONAL DATA

	<p>Source of your personal data</p> <p>Your personal data is acquired or will be acquired directly from you or through the organisation to which you belong. This data will be collected as part of the execution of the contractual relationship established.</p> <p>In addition, Abaco may also collect your data from other sources (e.g. public databases).</p>
	<p>Categories of personal data processed</p> <p>Abaco processes the following personal data concerning you:</p> <p>Common personal data</p> <ul style="list-style-type: none">➤ personal and contact data (e.g. name, surname, address, telephone number, mobile phone number, e-mail address, PEC address, fiscal code, identity document number, VAT number)➤ data relating to his corporate role (e.g. job title, place of work and positions held);➤ data relating to the management and performance of the contractual relationship (e.g. VAT number, payment information, transaction history, credit note processing, bank account details, invoicing data).


3. PURPOSE OF PROCESSING AND RELATED LEGAL BASES

 	<p>Abaco processes your personal data for the following purposes and related legal bases</p> <p>A. establishment, management and execution of the contractual relationship, including the management of invoices and payments. The legal basis legitimising the relevant processing is the performance of a contract to which you are a party or the execution of pre-contractual measures taken at your request. The provision of the data necessary for the pursuit of this purpose is a necessary requirement for the conclusion of the contract, and without it it will not be possible for Abaco to establish the contractual relationship.</p> <p>B. Fulfilment of obligations provided for by laws, regulations, provisions of authorities empowered to do so by law (e.g. <i>civil, tax and accounting obligations; obligations arising from the regulation of contracts and health and safety at work</i>). The legal basis legitimising the relevant processing is the fulfilment of a legal obligation to which the Company is subject. The provision of data is necessary to enable the Company to fulfil the legal obligations to which it is subject and without it Abaco would not be able to fulfil the legal obligations arising from the contract and, therefore, establish the contractual relationship.</p> <p>C. Protection of rights in the course of judicial and extrajudicial proceedings. The legal basis is the legitimate interest of the Company in ascertaining, exercising or defending a right in judicial or extrajudicial proceedings where necessary to protect its interests. In this case, a new and specific conferment is not required since the Company will pursue this further purpose, where necessary, by processing the data collected for the aforementioned purposes.</p>
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4. PROCESSING METHODS


	<p>The processing of personal data will be carried out, guaranteeing the security and confidentiality of your data, both on paper and by means of computer tools designed to store, manage and transmit the data.</p>
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5. DURATION OF PROCESSING


	<p>We retain your data only for as long as is necessary to achieve the purposes for which it was collected or for any other legitimate related purpose. Therefore, if the data are processed for two different purposes, we will keep those data until the purpose with the longer term ends. In any case, we will no longer process data for that purpose whose retention period has expired. Data that is no longer necessary, or for which there is no longer a legal basis for its retention, will be deleted.</p>
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	<p>Personal data processed for the purpose of establishing, managing and executing the contractual relationship will be retained for the duration of the relationship. Once the contractual relationship is terminated, only data functional to the fulfilment of legal obligations (e.g. civil, tax, etc.) will be retained for a maximum period of 10 years from the termination of the relationship.</p> <p>With particular reference to requests by the authorities or in the event of legal or extrajudicial protection of rights, the data will be kept for the time necessary to process the request or to pursue the protection of rights (i.e. for the entire duration of the litigation, until the time limit for appeals is exhausted).</p>
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6. RECIPIENTS OF PERSONAL DATA


	<p>In order to carry out certain processing activities, your data may be communicated to external parties who act as data controllers or who process personal data on behalf of the Company, in their capacity as data processors. In the event that personal data is processed by parties acting on behalf of the Company, Abaco regulates such processing by means of a contract pursuant to Article 28 GDPR whereby it gives the data controller specific instructions on the processing of personal data.</p> <p>Personal data may be communicated to the following categories of recipients</p> <ol style="list-style-type: none"> authorities and institutions to which the right of access to the data is granted by provisions of law or regulations (e.g. public security authorities and police forces) and additional data controllers, public or private, in the presence of a legal basis, such as a legal obligation; banking and credit institutions; public bodies (e.g. Revenue Agency). firms or companies in the context of assistance and consultancy relationships, including accountants; companies providing data centre and data management services; companies providing cloud and hosting services <p>The list of recipients, also appointed - where necessary - as data processors, will be constantly updated and made available upon request.</p>
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7. TRANSFER OF PERSONAL DATA


	<p>Abaco stores data in servers located within the European Union.</p> <p>Due to the location of some service providers, Abaco transfers data in the United States to companies that have certified their participation in the EU-US Data Privacy Framework.</p> <p>Where the Company, due to future requirements related to the location(s) of its</p>
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	<p>suppliers, needs to transfer data outside the European Union to countries for which the European Commission has not issued an Adequacy Decision, the Company undertakes to guarantee adequate levels of protection and safeguards, including contractual safeguards, in accordance with the applicable regulations, including the stipulation of standard contractual clauses pursuant to Article 46, paragraph 2, letter c) of the GDPR, supplemented, if necessary, by additional technical, legal and organisational measures necessary to ensure that the level of protection of personal data is equivalent to that of the European Union.</p>
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8. RIGHTS OF DATA SUBJECTS

	<p>In relation to the processing of your personal data, you may exercise your privacy rights under the GDPR, namely:</p> <ul style="list-style-type: none"> ➤ the right to receive confirmation of the existence of your personal data and the right to know what personal data is being processed and how it is being used (right of access); ➤ the right to request the updating, amendment and/or correction of personal data (right of rectification); ➤ the right to request deletion of data (right to be forgotten); ➤ the right to request the restriction of data processing (right of limitation); ➤ the right, where applicable, to object to processing (right to object); ➤ the right, where applicable, to receive a copy of the data in electronic format and to request that such data be transmitted to another data controller (right to data portability). <p>To exercise these rights you may</p> <ul style="list-style-type: none"> • contact Abaco by writing to the following e-mail address privacy@ibfservizi.it • contact the DPO at the e-mail address: dpo@ibfservizi.it
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9. RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY

	<p>If you believe that the processing of data relating to you is in breach of the applicable data protection legislation, you have the right to lodge a complaint with the Data Protection Authority, using the references available on the website www.garanteprivacy.it.</p>
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