

PRIVACY POLICY

Ramo S.r.l. with registered office in Povoletto (UD), via Faedis n.8, postal code 33040, VAT reg. no. IT 02638800306, contact mail info@ramosrl.org in its capacity **Data Controller**, pursuant to and for the purposes of **Articles 13-14 EU Regulation no. 2016/679** and of current Italian legislation, would like to inform you that your personal data will be processed in accordance with the following methods and purposes

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1 Data collected and processed

The Data Controller collects and processes:

- Personal data of CUSTOMERS/SUPPLIERS provided during the establishment of the contractual relationship and during its execution (including for example: name, surname, identity document, tax code, address, e-mail, telephone number), as well as payment data (information regarding payment methods e.g. bank details) or personal data optionally provided by completing the form on the web site necessary to ask for information about our services or provided when subscribing to our “Newsletter”;
- Personal Data optionally provided by WEBSITE USERS by browsing the website www.amosrl.org concerning preferences and interests (such as in particular: contents used, use of services, features used, connection times, traffic data, site browsing data and social profiles of the Data Controller or of commercial partners or third parties, IP address, devices and connection used) collected also by means of cookies and metadata;
- Personal data of EMPLOYEES/SELF EMPLOYED PEOPLE mandatorily requested by law, regulation, Community law or for the establishment of the contractual relationship and during its execution (such as: name, surname, permanent address, contact information, etc.), data indicating health status/suitability or unsuitability to perform specific tasks, trade union orientation, religious or political beliefs communicated when subscribing an employment contract and/or managing the employment relationship, data relating the attendance at work communicated during management of the employment relationship and data related to the use of the company's information technology equipment (e.g. e-mail, internet history, phone calls

etc.) collected in the event of investigations on the Law Firm's tool and information security;

- Personal data provided when you APPLY FOR A JOB and/or provided by the employee, if relevant for the professional skills, which are manifestly made public by the data subject by publishing them on social networks;

Ramo S.r.l. would like to inform you that it processes data jointly as a Joint Controller of the processing with several Social Networks, sharing purposes and means:

- Personal data which is provided optionally as a VISITOR to the company fanpage *Ramo Srl* on FACEBOOK inferred by social interactions, which are manifestly made public on your profile, as well as statistical data, also reprocessed in an aggregate form, about your preferences, your interests, your activities and the contents you used and/or liked.
- Personal data which is provided optionally as a VISITOR to the company page *Ramo Srl* on LINKEDIN inferred by social interactions, which are manifestly made public on your profile, as well as statistical data, also reprocessed in an aggregate form, about your preferences, your interests, your activities and the contents you used and/or liked.
- Personal data which is provided optionally as a VISITOR to the GOOGLE+ profile *Ramo Srl* inferred by social interactions, which are manifestly made public on your profile, as well as statistical data, also reprocessed in an aggregate form, about your preferences, your interests, your activities and the contents you used and/or liked

For further information, we recommend you check every Social Network in terms of service and privacy policy.

2 Purpose and legal grounds for data processing

The personal data described above may be processed for the following purposes:

A) to fulfil a contract: Data processing is legitimate since legal grounds are based on the need to:

- fulfil pre-contractual, contractual and tax obligations resulting from the relationship with you;

- perform the contract or fulfil the Data Controller's contractual obligations;

- fulfil obligations arising from either from laws, regulations, Community law or an order issued by an Authority (such as those regarding money laundering);

- exercise the Data Controller's rights (for example to allow the Data Controller to defend himself in legal proceedings, or prior to legal proceedings);

B) for the purpose of marketing: Data processing is legitimate since the legal grounds for this are based on the consent to:

- the transmission of e-mail and/or text messages and/or telephone contacts, newsletter, information or commercial leaflets and/or advertising material of products or services offered by the Data Controller and/or the results of customer satisfaction surveys;

- the transmission of e-mail and/or text messages and/or telephone contacts, information or commercial leaflets and/or advertising material of third parties (for instance business partners);

C) for the purpose of direct marketing (for existing Customers): Data processing is legitimate since the legal grounds for this are based on the legitimate interest to:

- transmit communications of a commercial nature and/or advertising material of products or services similar to those already purchased from the Data Controller

D) for the purpose of profiling: Data processing is legitimate since the legal grounds for this are based on the consent to:

- legitimise the analysis, including automated analysis, of preferences and interests (for example, use of content and services, including those purchased, features used, connection times, traffic data, etc.)

It is always possible for you to ask the Data Controller about the purpose and the legal grounds of each such data processing.

3 Data processing methods

Your personal data will be processed as hard copy and in a digital form. All data will be processed in accordance with principles of correctness, lawfulness and transparency and may also be performed by using automated procedures designed to store, manage and transmit personal data using appropriate tools to ensure the security and confidentiality of the same by means of appropriate procedures that prevent the risks of loss, unauthorised access, unlawful use and dissemination of data.

4 Communication of the data processed

Your personal data may be provided to authorised personnel and/or data processors (such as persons who supervise the computer system [system administrators]), companies and/or professional partnerships that provide accounting, administrative, tax, legal, fiscal and financial assistance and advice (accountants, employment consultants, lawyers, etc.), subjects operating in the legal sector, counterparties and their legal representatives, collegiate arbitration courts and, in general, all public bodies (INPS [National Institute of Social Insurance], INAIL [National Institute for Industrial Accident Insurance], INL [Italian Employment Inspectorate], etc.) and private entities (funds, pension and

assistance funds, Trade Unions, etc.), to whom your data must be communicated for the correct performance of the contract with this firm.

5 Period of retention

The Personal Data is processed and stored for the time requested by the purposes for which it was collected. The Data Controller retains any personal data processed for the purpose of performing a contract for the period of time required to manage any contractual obligations and, in any event, any personal data processed to defend a right will be retained for the period of time reasonably necessary for any such purposes and for the period of time in which said the claim may be pursued. Once the above terms of retention have expired, the data will be made anonymous and processed for aggregate and anonymous statistical analysis.

At the end of the retention period the Personal Data will be deleted. Therefore, at the end of this term the right of access, cancellation, rectification and the right to data portability can no longer be performed.

6 Personal Data transfer

Personal data may also be communicated to other consultants, free lances and the self-employed and/or to offices of other associated/subsidiary companies to the Ramo S.r.l. inside and/or outside the EU, which, in their capacity as Joint Data Controllers, have signed an agreement with the Data Controller. These offices - with particular attention to those located in non-EU countries - have been provided with detailed operating instructions by means of contractual clauses that guarantee that personal data will be processed in accordance with the principles established in the EU Regulation no. 2016/679 even to non-EU

third-party countries of destination. The Data Controller reserves the right to use cloud services, undertaking to select service providers from those providing adequate safeguards, as set out in Article 46 of EU Regulation no. 2016/679.

7 Rights of the data subject

You are entitled to request from the Data Controller access to and rectification or erasure of your personal data, to have incomplete personal data completed or restrict the processing of any personal data provided. You are also entitled to receive any personal data concerning you in a structured, commonly used and machine-readable format. You also have the right to withdraw your consent to processing at any time and to object in full or in part to the processing of your personal data. You are further entitled to lodge a complaint with the supervisory authority and to exercise the other rights recognised to you pursuant to Articles 15 - 22 of EU Regulation no. 2016/679.

8 How to exercise your rights

You may exercise your rights at any time by contacting the Data Controller by sending an e-mail to: info@ramosrl.org, which will be processed as soon as possible or by lodging a complaint with the supervisory authority.

If you are no longer interested in our communications and would like to cancel your subscription to the Newsletter, click on the “cancellation” link at the bottom of each e-mail sent or send an e-mail to info@ramosrl.org

9 Amendments and updates



This information notice may be amended. Please refer to our website, company notice boards and other channels made available for updates.

If you have any questions or concerns about our use of your personal information, please contact us using the above-mentioned details.

Povoletto, 25th May 2018

Ramo S.r.l.