

**Privacy Policy Statement - Articles 13 and 14 of Regulation (EU) 2016/679  
Privacy Policy Statement for actual and potential Customers**

**Who are we and what do we do with your personal data**

GREEN OLEO s.p.a., hereinafter the Data Controller, safeguards the confidentiality of your personal data and guarantees them the necessary protection against any event which may put their security at risk.

For this purpose, the Data Controller implements policies and practices with regard to the collection and use of personal data and the exercise of your rights under the relevant law. The Data Controller takes care to update the policies and practices adopted for the protection of your personal data whenever necessary, and always in the event of regulatory or organisational changes which may affect the processing of your personal data.

The Data Controller did not designate a Data Protection Officer (DPO) as the conditions of art. 37 GDPR are not applicable in our specific case.

**How we collect, process your PERSONAL DATA and for which PURPOSES**

The Data Controller collects and/or receives your data, such as: **your name, surname, tax code, date and place of birth, physical and digital address, landline and/or mobile phone number, bank current account number and identification code. The Data Controller needs these data to manage the service contract and fulfil the legal and regulatory obligations with which it is obliged to comply by the nature of its business.**

The Data Controller does not transfer your personal data ABROAD. Your personal data will not be in any way disseminated or disclosed to unspecified and unidentifiable subjects, even as third parties.

Your personal data will be processed for:

**1) THE MANAGEMENT OF THE CONTRACT RELATIONSHIP AND THE FULFILMENT OF THE CONSEQUENT LEGAL AND OTHER OBLIGATIONS**

Your personal data are processed in order to carry out the activities preliminary to and consequent on the service of interest to you, such as order management, billing and payment management, the management of complaints and/or reports to the technical service, management and fulfilment of contractual and legal warranties, and the fulfilment of all other obligations arising from the contract, such as the recording and filing of your personal data.

**2) FOR COMMUNICATION TO THIRD PARTIES AND RECIPIENTS**

Your data will not be communicated to third parties/recipients for their own independent purposes unless:

1. you authorise it;
2. this is necessary for the fulfilment of obligations arising from the contract and from the law governing it (e.g. for the protection of your rights, for reports to supervisory authorities, etc.);
3. the data are provided to auditing companies; quality monitoring and certification companies; banks for the management of collections and payments; law firms for the protection of contractual rights and/or credit recovery; and data processing and IT service provider companies (e.g. web hosting, data entry, infrastructure and IT service management and maintenance, etc.), tax consultant;
4. data are disclosed to the Inland Revenue and public supervisory and control organisations in relation to which the Data Controller is obliged to comply with specific obligations arising from the nature of its business.

**3) FOR DATA SECURITY PURPOSES**

Including through its suppliers (third parties and/or recipients), the Data Controller processes your personal data, including IT data (e.g. digital accesses) or traffic data, collected or obtained in the case of services displayed on the website, to the extent strictly necessary and proportionate, in order to guarantee the security and capacity of a network or the servers connected to it to withstand, with a specified security level, unforeseen events or illegal or unintentional acts which jeopardise the availability, authenticity, integrity and confidentiality of the personal data stored or transmitted.

For these purposes, the Data Controller implements procedures for the management of personal data breaches, in accordance with the legal obligations on it.

**What happens IF YOU DO NOT SUPPLY YOUR DATA**

If you do not supply your personal data, the Data Controller will not be able to perform the data processing relative to management of the contract and the relevant services, or the legal obligations arising from them.

**How, where and for HOW LONG are your data stored**

Your personal data are processed using both electronic and manual tools made available to the entities acting under the authority of the Data Controller. The paper and above all the electronic database files where your data are stored and conserved are protected by means of effective security measures which prevent the data breach risks considered by the Data Controller. The latter performs regular, constant checks on the measures adopted, especially for electronic and digital tools, to guarantee the confidentiality of the personal data they are used to process, file and conserve, above all those in special categories.

Personal data are stored for the time necessary for the performance of the activities related to management of the contract with the Data Controller and for the fulfilment of the consequent legal and other obligations.

The databases are inside the EU (and EEA) and no connection or interaction with databases abroad is envisaged.

**How**

Data are processed on paper media or using computerised procedures by specifically authorised and trained in-house staff. They are granted access to your personal data to the extent and within the limits necessary for the performance of the processing activities which concern them.

The Data Controller regularly checks the tools by which your data are processed and the security measures provided for them, which are constantly updated; it ensures, also through the authorised data processors, that no personal data the processing of which was not necessary have been collected, processed, filed or stored; it ensures that the data are stored with guarantees of integrity and authenticity, and that they are used for the purposes of the processing actually undertaken.

### **Where**

Data are stored in paper, IT and computer files in the European Economic Area and protected by suitable security measures.

For how long

**The personal data processed by the Data Controller are stored for the time necessary for the performance of the activities related to management of the contract with the Data Controller and for ten years after its conclusion (article 2946 of the Italian Civil Code) or after the time when the rights arising from it can be exercised (pursuant to art. 2935 of the Civil Code), and also for the fulfilment of obligations (e.g. fiscal and accounting obligations) which continue even after conclusion of the contract (art. 2220 Civil Code). This is with the exception of cases in which the rights arising from the contract have to be legally enforced, in which case your data (only those necessary for this purpose) will be processed for the time essential for the said enforcement.**

However, you retain the right to object to the processing of the data at any time on the basis of lawful interest for reasons related to your specific circumstances.

### **What are your RIGHTS**

Basically, at any time and free of charge, without any particular obligations or formalities for your request, you may:

- obtain confirmation of the processing carried out by the Data Controller;
- access your personal data and be informed of their origin (if the data were not obtained from you directly), the purposes and aims of the processing, the details of the parties to whom they are communicated, and the storage period of your data or the criteria used to decide it;
- withdraw your consent at any time if this constitutes the basis for the processing of the data. However, withdrawal of consent does not prejudice the lawfulness of the consent-based processing prior to the withdrawal;
- have your personal data updated or rectified to ensure that they are always correct and accurate;
- have your personal data erased from the Data Controller's databases and/or files, including backups, if, amongst other factors, they are no longer necessary for the purposes of the processing or if the processing is seen as unlawful, and provided the legal conditions are met; and therefore if the processing is not justified on other, equally legitimate, grounds;
- restrict the processing of your personal data in some circumstances; for example, if you have disputed their accuracy, for the period necessary for the Data Controller to verify their accuracy. You must be also be informed, within an appropriate time, when the suspension period has ended or of the cause why the restriction on the processing has been removed, leading to the revocation of the restriction;
- obtain your personal data, if they have been received and/or in any way processed by the Data Controller with your consent and/or if they are processed on the basis of a contract and with automated tools, in digital format, also to allow them to be transmitted to another data controller.

The Data Controller must fulfil this request without delay, and in all cases within no more than one month after its receipt. The term may be extended for two months, if necessary, also considering the complexity and number of the requests received by the Data Controller. In these cases, the Data Controller shall notify you and inform you of the reasons for the extension within one month after receipt of your request. For all further information and to submit requests, please contact the Data Controller at [privacy@greenoleo.com](mailto:privacy@greenoleo.com)

### **How and when can you object to the processing of your personal data**

For reasons relating to your individual situation, you may object to the processing of your personal data at any time if the objection is based on lawful interest, by sending your request to the Data Controller at the above address. You are entitled to the erasure of your personal data if there is no lawful reason which prevails over the one on which your request is based.

### **Who can you COMPLAIN to**

While retaining all rights to further administrative or legal proceedings, you can submit a complaint to the competent controlling authority, which will be the one which performs its functions and exercises its power where you are resident or work, or in the Member State where the breach of Regulation (EU) 2016/679 occurred, if different. You will be informed if the Data Controller processes your data for DIFFERENT PURPOSES from those covered by this policy statement, before such processing begins and in time for you to give your consent if necessary.

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