



PRIVACY

Complete policy Users-customers-suppliers

[[It.] Legislative Decree 196/2003 and GDPR Reg. EU no. 2016/679]



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

The company LM INDUSTRY s.r.l., 35/a Via Strada del Confine 36056 Belvedere di Tezze sul Brenta (VI) - Tax Code 02739500243 - VAT number 02739500243, in the capacity as the Data Controller, is concerned about the confidentiality of your personal data and guarantees them the necessary protection from any event that could put them at risk of a breach.

For this purpose, LM INDUSTRY s.r.l. implements policies and practices with reference to the collection and use of personal data and the exercise of the rights that are recognised by the applicable legislation. LM INDUSTRY s.r.l. is responsible for updating the policies and practices adopted for the protection of personal data whenever this becomes necessary and however in the event of regulatory and organisational changes that may affect the processing of your personal data.

How and how does LM INDUSTRY s.r.l. collect and process your data?

LM INDUSTRY s.r.l. collects and/or receives information that concerns you, such as:

- name, surname;
- tax code;
- place and date of birth;
- nationality;
- sex;
- physical and electronic address;
- landline and/or mobile phone number;
- computer data (deriving from e-mail address and/or login access to dedicated platforms);
- if applicable and if necessary for the performance of the requested services, data related to your banking solvency and debit position collected by you directly or from public databases;
- social media accounts.

Your personal data will be processed for the following purposes:

1) The management of the relationship and of the subsequent (regulatory) obligations

Purposes	Legal basis
- the management of the relationship established in all its phases	Performance of activities deriving from the provision of services
- the keeping of corporate books/records and accounting and tax books	Fulfilment of legal obligations deriving from the relationship established, such as, among others, those deriving from: <ul style="list-style-type: none"> - (It.) Presidential Decree no. 633/1972 as subsequently amended and supplemented. As well as those deriving from the application of: <ul style="list-style-type: none"> - Fulfilment of economic-financial and association reporting obligations

Your data may be communicated/collected also to/from third parties such as:

- other data controllers for e.g. financial administration and/or public and/or institutional and/or insurance or similar bodies
- external accounting and tax consultants
- legal advisors
- auditors
- IT service providers

and the data concerning you can be obtained by consulting:

- lists kept by public/institutional and/or insurance or equivalent bodies or under the control of the public authority on the basis of specific national legislation;

LM INDUSTRY s.r.l. does not transfer your personal data abroad (non-EU countries).

2) For communication to third parties for the purpose of sending promotional communications of their activities/services

Purposes	Legal basis
Communication to third parties such as: <ul style="list-style-type: none"> • public and/or institutional and/or insurance or similar bodies • external accounting and tax consultants • legal advisors • auditors • IT service providers 	Your consent

The communication concerns the categories of data listed above and specifically:

- name, surname
- physical and electronic address
- landline and/or mobile phone number

3) For IT security activities

Purposes	Legal basis
- control and monitoring of the use of equipment and IT infrastructures belonging to LM INDUSTRY s.r.l.	Conduct of activities deriving from the relationship established
- implementation of procedures for the detection and notification of data breaches	Compliance with legal obligations (detection and notification of data breach events) Legitimate interest

4) For sending communications of a promotional nature by LM INDUSTRY s.r.l.

Purposes	Legal basis
- sending SMS, e-mail, paper mail, phone calls,	Your consent

The sending of communications concerns the categories of data listed above and specifically:

- name, surname
- physical and electronic address
- landline and/or mobile phone number

DATE OF ISSUE	REV. NO.	REVISION DATE	PAGE	DESCRIPTION
02/01/2019	0		2 / 5	First issue



5) For statistical purposes

Purposes	Legal basis
- statistical analysis by the Controller	Legitimate interest of the controller

How, where and for how long are your data stored?

How

Data processing is performed on paper support or by IT procedures by specifically authorised individuals. These individuals can access your personal data to the extent to and within the limits in which it is necessary for the performance of the processing activities that concern you.

LM INDUSTRY s.r.l. periodically checks the equipment through which your data are processed and the security measures established for them which are constantly updated; it verifies, also through the persons in charge of the processing, that no personal data are collected, processed, filed or stored, the processing of which is not necessary or whose purposes are completed; it verifies that the data are kept with the guarantee of integrity and authenticity and that they are used for the purposes of the processing actually performed. LM INDUSTRY s.r.l. guarantees that the data that, even after the verifications, are superfluous or irrelevant will not be used except for the possible retention, according to the law, of the document or deed containing them.

Where

The data are stored in paper, electronic and computerised files, located within the European economic area, and security measures are provided to protect them.

For how long

Your personal data are kept for the time necessary to complete the activities related to the management of the relationship with LM INDUSTRY s.r.l. and for the (legal) obligations that this entails.

In particular:

Computer data (login access to systems and network and/or IP addresses)	The duration of retention depends on the presumed and/or detected risk and on the prejudicial consequences that derive therefrom, without prejudice to the measures to make the data anonymous or able to limit their processing In any case, the data must be retained (from the knowledge/detection of the danger or data breach) for the time necessary to notify the data protection authority of the data breach through the procedures implemented by LM INDUSTRY s.r.l. and anyway to remedy them
Personal identification data (name, surname, physical and electronic address, landline and/or mobile telephone number) for sending promotional communication of services/activities	Without prejudice to the withdrawal of consent in the case provided, the duration of the retention shall be a maximum of 24 months from the provision of the consent itself.

Once all the purposes that legitimise the retention of your personal data have been achieved, LM INDUSTRY s.r.l. shall delete them or make them anonymous.

What are your rights?

The rights that are recognised to you allow you to always have control of your data. Your rights include:

- access;
- rectification;
- withdrawal of consent;
- erasure;
- restriction of processing;
- objection to processing;
- portability.

In essence you can, at any time, free of charge and without any specific conditions and formalities for your request:

- obtain confirmation of the processing performed by LM INDUSTRY s.r.l.;
- access your personal data and know their origin (when data are not obtained from you directly), the purposes and scope of the processing, the data of the parties to whom they are communicated, the retention period of your data or the criteria useful to determine it;
- update or rectify your personal data so that they are always exact and accurate;
- withdraw consent at any time, if this constitutes the basis of the processing. The withdrawal of consent, however, does not prejudice the lawfulness of the processing based on the consent granted before withdrawal thereof;
- erase your personal data from the databases and/or archives including backup where they are no longer necessary for the purposes of the processing or if this is assumed to be illicit, and if the conditions required by law are met; and however if the processing is not justified by another equally legitimate reason;
- restrict the processing of your personal data in certain circumstances, for example where you have disputed its accuracy, for the period necessary for LM INDUSTRY s.r.l. to verify such accuracy. You must be informed, in reasonable time, even when the suspension period has been completed or the cause of the limitation of processing no longer exists, and therefore the limitation itself is withdrawn;

Identification data	Duration of the contractual relationship
identification data fiscal, administrative/accounting data if applicable and if necessary for the performance of the requested services, data related to your banking solvency and debit position collected by you directly or from public databases social media accounts	Without prejudice to: - the restriction of processing and other guarantees provided for data relating to criminal convictions or offences and related security measures - the termination of the relationship (for any reason) - the purposes that continue beyond the conclusion of the relationship (e.g. account keeping, art. 2220 of the (It.) Civil Code) - the limitation terms: from five to ten years from the establishment of the relationship and in any case from the moment in which the rights arising from it can be exercised (articles 2935, 2946 and 2947, and articles 18 and 22, of the (It.) Civil Code) Except for any litigation if it involves an extension of the aforementioned terms, for the time necessary to pursue the related purpose

DATE OF ISSUE	REV. NO.	REVISION DATE	PAGE	DESCRIPTION
02/01/2019	0		3 / 5	First issue



- obtain your personal data, if their processing is done on the basis of a contract and with automated equipment, in electronic format also in order to transmit them to another data controller.

LM INDUSTRY s.r.l. must do so without delay and, however, no later than one month after receiving your request. The deadline may be extended by two months if necessary, taking into account the complexity and the number of requests received. In such cases, LM INDUSTRY s.r.l. will inform you within one month of receiving your request and shall provide you with the reasons for the extension.

For any further information and to send your request write to LM INDUSTRY s.r.l. at the address info@lm-industry.com

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

For reasons related to your particular situation, you may object at any time to the processing of your personal data if it is based on legitimate interest, by sending your request to LM INDUSTRY s.r.l. at the address info@lm-industry.com

You have the right to the erasure of your personal data if there is no legitimate reason overriding the one that gave rise to your request.

Who can you lodge a complaint with?

Without prejudice to any other administrative or judicial action, you may lodge a complaint with the data protection authority, unless you reside or work in another Member State. In the latter case or in case the violation of the legislation on the protection of personal data takes place in another EU country, the supervisory authorities established therein have the power to receive and know said complaint.

Each update of this policy will be communicated to you promptly and by appropriate means and you will be notified if LM INDUSTRY s.r.l. processes your data for purposes other than those referred to in this policy before proceeding and in time for you to provide your consent if necessary.

Rossano Veneto (VI) _____ ,

The Data Controller

DATE OF ISSUE	REV. NO.	REVISION DATE	PAGE	DESCRIPTION
02/01/2019	0		4 / 5	First issue

LM Industry srl

36056 Belvedere di Tezze sul Brenta (VI)
Via Strada del Confine, 35/a - ITALY
Internet: **www.lm-industry.com**

Tel.: ++39 0424 84617
Fax: ++39 0424 84925
info@lm-industry.com