



Società con socio unico soggetta ad attività di direzione e coordinamento di Italgraphica S.r.l.

SEDE AMMINISTRATIVA E STABILIMENTO:  
Area Industriale Calaggio  
I - 83046 LACEDONIA (AV)  
tel. +39 0827 85681  
fax +39 0827 85683  
www.italpackcartons.com  
italpack@italpack.com  
PEC: amministrazione\_italpackcartons@pec.it

Cap. Soc. Euro 7.430.223,00 i.v.  
R.E.A. NA - 1004730  
Iscrizione Registro delle Imprese di Napoli  
e Codice Fiscale 02362380640  
P.IVA 02362380640

Vat number IT 02362380640

SEDE LEGALE:  
Via Del Rione Sirignano, 7  
80121 NAPOLI

## PRIVACY CUSTOMER'S INFORMATION

Naples, 11/04/2023

Dear Customer/Partner/Agency/ etc., I write to inform you about the methods of processing your personal data / employees / collaborators in accordance with the EU Regulation 2016/679 for privacy. With regard to this, we will inform you of any need to process the same data outside the EU. Finally, please note that once you have completed the legal terms for the storage of the personal data that you will provide to us (e.g. for tax or other legal purposes), you may ask us to delete them from our archives. Therefore, the data transmitted by you or by your contact persons/ collaborators will be managed and processed by us as indicated in the following statement:

### 1. Subject matter of processing

The Data Controller processes personal, identifying and non-sensitive data (in particular, name, surname, fiscal code, VAT number, email, telephone number - later, "personal data" or even "data") communicated during the phase of contract or work.

### 2. Purpose of the processing

Personal data are processed:

A. without your express consent (art. 24 lett. a, b, c Privacy Code and art. 6 lett. b, and GDPR), for the following purposes:

- to fulfill commercial, pre-contractual, contractual and fiscal obligations arising from relations with you in being;
- to fulfill the contract, the service you requested and perform it in the correct manner working;
- to comply with the obligations laid down by law, by explicit requests of the Police or of the Judiciary, by a regulation, by Community legislation or by an order of the Authority;
- to prevent or uncover fraudulent activities or abuse harmful to existing activities;
- to promptly inform your contact persons in case of operational and administrative needs;
- to exercise the rights of the Data Controller, for example the right of defence in court.

B. Only after your specific and distinct consent (art. 23 and 130 Privacy Code and art. 7 GDPR), for the following purposes:

- none

### 3. Methods of processing

The processing of personal data is carried out by means of the operations indicated in art. 4 Privacy Code and art. 4 n. 2) GDPR and precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion and destruction of data. Personal data are processed both on paper and electronically and/or automated.

The Data Controller will process personal data for the time necessary to fulfill the above purposes and in any case for no more than 5 years from the cessation of the activity for the purposes of service and for tax - administrative management.

### 4. Access to data

The data may be made accessible for the purposes referred to in art. 2.A) and 2.B):

- to employees and collaborators of the Data Controller, in their capacity as internal data processors and/or system administrators;
- to companies of services essential to the Data Controller to provide your service (for example, for organizational management activities, for telecommunications activities, for technical management activities, for the storage of personal data, etc.)
- to third parties (for example, providers for the management and maintenance of the website,
- suppliers, our sales agents, credit institutions, professional offices, etc.) who also carry out





SEDE AMMINISTRATIVA E STABILIMENTO:  
Area Industriale Calaggio  
I - 83046 LACEDONIA (AV)  
tel. +39 0827 85681  
fax +39 0827 85683  
www.italpackcartons.com  
italpack@italpack.com  
PEC: amministrazione\_italpackcartons@pec.it

Cap. Soc. Euro 7.430.223,00 i.v.  
R.E.A. NA - 1004730  
Iscrizione Registro delle Imprese di Napoli  
e Codice Fiscale 02362380640  
P.IVA 02362380640

SEDE LEGALE:  
Via Del Rione Sirignano, 7  
80121 NAPOLI

Società con socio unico soggetta ad attività di direzione  
e coordinamento di Italgraphica S.r.l.

Vat number IT 02362380640

outsourcing activities on behalf of the Data Controller, in their capacity as external data processors.

## 5. Communication of data

Also without your express consent (ex art. 24 lett. a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), the Data Controller may communicate your data for the purposes referred to in art. 2.A) to Supervisory Bodies, Judicial Authorities as well as to all other subjects to whom communication is mandatory by law for the fulfilment of the aforementioned purposes.

## 6. Data transfer

The management and storage of personal data will take place on servers located within the European Union, owned by the Data Controller and/ or third parties duly appointed as Data Processors. Currently the servers are located in Italy and the EU in general. The data will not be transferred outside the European Union. It remains in any case understood that the Data Controller, if it becomes necessary, will have the right to move the server location in Italy and/or European Union and/or non-EU countries.

In this case, the Data Controller ensures that the transfer of data outside the EU will take place in accordance with the applicable legal provisions by stipulating, where necessary, arrangements ensuring an adequate level of protection and/or adopting the standard contractual clauses provided by the European Commission.

## 7. Nature of data provision and consequences of refusal to reply

The provision of data for the purposes referred to in art. 2.A) is mandatory. In their absence, we will not be able to guarantee the provision of the services requested and contracted by you.

## 8. Rights of the data subject

The staff referred to you, in your capacity as data subject, has the rights referred to in art. 7 Privacy Code and art. 15 GDPR and precisely the rights of:

- obtain confirmation of the existence or otherwise of personal data concerning you, even if not yet recorded, and their communication in an intelligible form;
- obtain the indication: a) of the origin of personal data; b) of the purposes and methods of processing; the logic applied in the case of processing carried out with the help of electronic tools; the identification details of the owner, the managers and the representative designated pursuant to art. 5, paragraph 2 Privacy Code and art. 3, paragraph 1, GDPR; e) the subjects or categories of objects to which personal data may be disclosed or that may become aware of them as a designated representative in the territory of the State, of managers or agents;
- obtain: a) the updating, rectification or, where it is of interest to you, the integration of data; b) the deletion, the transformation into anonymous form or the blocking of data processed in violation of the law, including those for which storage is not necessary in relation to the purposes for which the data were collected or subsequently processed; c) proof that the operations referred to in paragraphs a) and b) have been brought to the attention of the person concerned, including as regards their content, of those to whom the data have been communicated or disseminated, except where such compliance proves impossible or involves the use of means which are manifestly disproportionate to the protected right;
- oppose, in whole or in part: a) for legitimate reasons to the processing of personal data concerning you for the purposes referred to in art 2B).

Where applicable, you also have the rights referred to in art. 16-21 GDPR (Right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object), as well as the right to complain to the Data Protection Authority.





Società con socio unico soggetta ad attività di direzione e coordinamento di Italgraphica S.r.l.

SEDE AMMINISTRATIVA E STABILIMENTO:  
Area Industriale Calaggio  
I - 83046 LACEDONIA (AV)  
tel. +39 0827 85681  
fax +39 0827 85683  
www.italpackcartons.com  
italpack@italpack.com  
PEC: amministrazione\_italpackcartons@pec.it

Cap. Soc. Euro 7.430.223,00 i.v.  
R.E.A. NA - 1004730  
Iscrizione Registro delle Imprese di Napoli  
e Codice Fiscale 02362380640  
P.IVA 02362380640

Vat number IT 02362380640

SEDE LEGALE:  
Via Del Rione Siriginano, 7  
80121 NAPOLI

## 9. Procedures for exercising rights

You may, through your contact persons, at any time, exercise the rights of the same by sending (alternatively among them):

- a registered letter a.r. to Italpack Cartons s.r.l., Via Rione Siriginano, 7, Naples
- a pec to [amministrazione\\_italpackcartons@pec.it](mailto:amministrazione_italpackcartons@pec.it)
- an e-mail to [privacy@italpack.com](mailto:privacy@italpack.com).

## 10. Data Controller, Data Processor and Data Processors

The Data Controller is Italpack Cartons s.r.l. The updated list of data processors and data processors is kept at the headquarters of the Data Controller.

## 11. Amendments to this Policy

This policy may change. In this case, you will be promptly sent the most updated version.

The CEO  
Italpack Cartons s.r.l.

