

MATERIAL DOWNLOAD REQUEST **FORM INFORMATIONS**

INFORMATION FOR INDIVIDUALS **PURSUANT TO ART.13 OF EU REGULATION 679/2016**

The EU Regulation 679/2016 provides for the right to the protection of personal data concerning natural persons. In compliance with this regulation, our Company informs you of the following:

Purposes of data processing: the processing of personal data relating to you has the purpose of enabling the data controller company and its employees and/or partners in charge to carry out the following activities:

- 1. Management and execution of your request to download our technical-commercial material:** consent is not required and the legal basis of data processing for this purpose is the satisfaction of the request (art.6.1 lett, b) GDPR).
- 2. Protection of intellectual and industrial property rights on all our material:** since the Company reserves every and broader right of intellectual and industrial property on all our technical-commercial material made available, your data is linked to the downloaded material. Consent is not required and the legal basis for the processing of data for this purpose is the protection of our legitimate interest (art.6.1 lett, f) GDPR).
- 3. Sending of material and newsletters for advertising purposes:** prior consent is required and the legal basis for data processing is the consent itself (art.6.1 lett. a) GDPR).
- 4. Internal statistics for aggregate data:** consent is not required and the legal basis of data processing for this purpose is the legitimate interest of the owner (art.6.1 lett, f) GDPR).

In relation to the processing of your personal data marked with (*) for the purposes referred to in points 1) and 2), the provision of your data is compulsory and refusal to provide them will make it impossible to fulfill your request. On the other hand, in relation to the purposes referred to in points 3) and 4), the provision of your data is not compulsory and will not prejudice the fulfilment of your request.

Method of data processing: the data is processed in both paper and electronic form, in compliance with the security measures referred to in art.32 GDPR.

Dissemination, transfer of data outside the EEA and communication: unless required by a law or regulation or Community legislation, your personal data are not subject to dissemination and are not subject to transfer outside the territory of the European Union except, in any case, compliance with all legal requirements. The subjects to whom your personal data may be communicated are the following:

1. external subjects who may carry out tasks on behalf of our companies to which the Data Controller should entrust some outsourced activities (e.g.: accountants, consultants) or producers of software and/or platforms necessary for the execution of the contract;
2. credit institutions for the management of payments and collections arising from the execution of contracts;
3. professionals, in order to study and resolve any legal problems relating to your contractual position (e.g.: lawyers);

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4. other subjects provided for by law.

The data controller is: Società Starpool S.r.l., with registered office in via Stazione n.25, 38030 Ziano di Fiemme (TN), Tel. +39 0462 571881 - e-mail: info@starpool.com.

The internal contact for the processing of your personal data is: the HR Manager, for the provisions of EU Regulation 679/2016, at the headquarters of our Company. It should be noted that the company Starpool S.r.l. is not subject to the obligation to appoint a Data Protection Officer provided for in art. 37 of the Regulation (Data Protection Officer - DPO).

Period of data retention: Your data will be retained: for a maximum period of 10 (ten) years from your use of the downloaded material for the purposes referred to in points 1) and 2); until revocation of consent for the purpose referred to in point 3); for a maximum period of one year for the purpose referred to in point 4) for the sole purpose of allowing the aggregation of data. Your right to obtain, at any time, the cancellation or limitation of the use of the data is always reserved where this does not conflict with a precise legal obligation (art.2220 c.c., art.43 D.P.R. 600/73) or with our legitimate interest such as, for example, the protection of our intellectual and industrial property rights.

Complaints: you can complain to the Privacy Guarantor in any case of unlawful processing of your data. **You may assert your rights**, as governed by Articles 15, 16, 17, 18, 19 and 21 of EU Regulation 679/2016, by writing to: Company Starpool S.r.l., with registered office in Via Stazione n.25, 38030 Ziano di Fiemme (TN), Tel. +39 0462 571881 - e-mail: info@starpool.com

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