

“Trade marketing” privacy policy



1. Data Controller

Radiatori 2000 S.p.A., with registered offices at Via Francesca, 54/A - 24040 Ciserano (BG), Tax ID Code and VAT reg. no. 03554100176, hereinafter “Controller”, guarantees full compliance with data protection regulations, and provides the following information with regard to data processing, pursuant to Art. 13, EU Regulation 2016/679 (General Data Protection Regulation – GDPR) and subsequent amendments.



2. Data processed, purposes and legal grounds for processing

Data acquired will be processed for the following purposes:

- for relations with the distributor, based on contractual and/or pre-contractual agreements;
- For administrative purposes and to fulfil legal obligations, such as, for example, accounting or fiscal obligations, or to meet requests from judicial authorities;
- for the occasional sending of emails concerning products and/or services already supplied or similar to same (so-called “soft-spam”).

The legal basis for lawful processing:

- with regard to the purposes as stated in point 2 letter a) and b), it is the performance of a contract to which the data subject is party or the execution of pre-contractual measures adopted at the request of same;
- with regard to the purposes as per point 2 letter c), it is the legitimate interest of the Controller.



3. Nature of provision

Provision of data:

- with regard to the purposes as per point 2 letter a) and b), it is optional but any refusal will involve the impossibility for the Controller to meet the contractual undertakings.
- With regard to the purposes as per point 2 letter c), it is optional but any refusal will make it impossible to send occasional emails concerning products and/or services similar to same (so-called “soft-spam”).

Sede

Via Francesca, 54/A
24040 Ciserano (BG) - Italy

Telefono e Fax

T. +39 035 4810174
F. +39 035 4821852

Email e PEC

radiatori@radiatori2000.it
PEC pec@pec.radiatori2000.it



4. Processing locations and methods and data retention times

The data collected from the website are processed at the Controller's headquarters.

Data collected will be processed using electronic or in any case, automated or computerised or telematic means, or using manual processing with logic strictly related to the purposes for which said personal data were collected and, in any case, in such a way as to guarantee the security of same.

Data are retained for the time strictly necessary to the purpose for which they were processed ("storage limitation principle", Art.5, EU Regulation 2016/679), or in compliance with the expiry set out in current standards or obligations set down by law.

Checks of the obsolescence of data stored in line with the purposes for which they were collected will be made regularly.

In any case, the Data Controller implements rules that prevent permanent data retention and therefore, limits the retention time according to the principle of minimizing data processing.



5. Authorised subjects, data processors and data communication

The processing of data collected is performed by the Data Controller's internal staff, appointed for this purpose and authorised to perform processing according to specific instructions issued in compliance with current regulations.

The data collected, within the limits pertaining to the purposes of processing stated and in the event it is necessary or useful for the execution of the purposes itself, may be processed by third parties appointed by external Processors, i.e., according to cases, communicated to those subjects necessary for the correct completion of the aims set out in point 2.

The data collected can be provided, in the event of lawful request, solely in the cases envisaged by law, by the Legal Authority.

Under no circumstances will your data be circulated in any way.



6. Data transfer to non-EU countries

Data can be transferred abroad to non-EU countries and in particular, to the United States, only after assessment of the standard contractual clauses adopted/approved by the European Commission, pursuant to Art. 46, par. 2 letter c) and d) of the GDPR or by the binding regulations for companies, as

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per Art. 47 of the GDPR or in the absence of such, by order of one of the derogating measures as per Art. 49 of the GDPR.

The transfer to the United States is authorised according to the specific agreement known as the EU-US Data Privacy Framework (available [here](#)), for which no further consent is required.



7. Data subject's rights

With regard to the personal Data communicated, the Data subject has the right to exercise the following rights:

- a. (Art. 7.3 Regulation EU 679/2016 – GDPR) withdrawal of consent;
- b. (Art. 15 Regulation EU 679/2016 – GDPR) accessing and asking for a copy;
- c. (Art. 16 Regulation EU 679/2016 – GDPR) requesting correction;
- d. (Art. 17 Regulation EU 679/2016 – GDPR) requesting deletion (“right to be forgotten”);
- e. (Art. 18 Regulation EU 679/2016 – GDPR) obtaining data minimisation;
- f. (Art. 20 Regulation EU 679/2016 – GDPR) receiving data in a structured format, commonly used and readable from an automatic device, for the purposes of exercising the right to portability;
- g. (Art. 21 Regulation EU 679/2016 – GDPR) opposing processing.

The data subject can exercise their rights as well as ask for more information about their Personal Data, by sending an email to radiatori@radiatori2000.it and specifying the content of their request in the subject line.

Requests concerning the Data subject's choice to avail of their rights will be issued without undue delay and, in any case, within one month of the request; only in particularly complex cases and large number of requests, may this be extended by a further 2 (two) months.

Please remember that it is your right (as per art. 77 Regulation EU 679/2016 – GDPR) to submit a complaint to the Data Protection Authority, whose contact information is available [here](#)

Latest update: 06 May 2024

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