



Convertitori elettrici - Electrical converters - Convertisseurs électriques - Stromrichteranlagen
Via Edison, 1 - 20090 SEGRATE (MILANO) - Italy
Telephone : ++39-02-87235350 - Telefax: ++39-02-26.92.30.36
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PRIVACY POLICY



Convertitori elettrici - Electrical converters - Convertisseurs électriques - Stromrichteranlagen
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VERSIONE 1.2019
DATA APPROVAZIONE:



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FRIEM S.p.A. (henceforth "FRIEM" or "The Company"), with headquarters at Via Edison 1, 20090 Segrate, email address: privacy@FRIEM.com, collects as the main processor the personal data directly or indirectly supplied, also through their associates, from their clients and Company contacts (henceforth collectively referred to as "Clients"), in accordance with this policy on the use of personal data.

1. Personal Data collected from the company

FRIEM collects the following categories of personal data:

- contact data of employees, Clients or employees of the Client where the latter is a legal entity;
- identification data of employees and clients which are functional to the necessary controls for compliance with the applicable regulation; and
- information supplied by the Client relating to the contract stipulated with the Company (henceforth collectively referred to as "**Personal Data**")

2. Purpose of the collection of personal data:

FRIEM processes Personal Data for the following purposes:

- a) the correct and final fulfilment of the contract;
- b) for administrative/accounting purposes;
- c) for the purpose of compliance with the applicable regulation; (purposes from a) to c) are collectively referred to as "**Contractual Purposes**")

3. Legal bases of the processing of personal data collected by the company

The processing of Personal Data is necessary with reference to the Contractual Purposes given its essential nature to:

- fulfil the contract with the client, with reference to the cases under Section 2 a) and b);
- comply with the orders of the applicable regulation as per Section 2 c).

If the Client does not supply the personal data necessary for contractual purposes, it will be impossible to fulfil the contract.



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The processing of Personal Data for Purposes of Legitimate Interests is carried out in accordance with Article 6 f) of the UE Regulation 2016/679 on the protection of personal data 2016/679 (the "**Privacy Regulation**") for the pursuit of the legitimate interests of FRIEM, which is equitably balanced with the interests of the Client, since the action of the processing of personal data is limited to that which is strictly necessary for the performance of such action, and segmentation is performed only within the limits indicated above. Data processing for Purposes of Legitimate Interests is not mandatory and the Client can oppose such processing in the manner stated in this policy; in such case, FRIEM will not be able to process Personal Data for such purpose, unless FRIEM can prove the existence of prevailing legitimate reasons.

4. Modalities of the processing of personal data

Personal data can be processed through manual or computerized tools which suitably guarantee safety, privacy and the avoidance of non-authorized access, diffusion, modifications, and theft of data thanks to the adoption of adequate technical, physical and organizational measures.

5. Processing of data abroad

Personal data can be transferred outside the national territory to European Union Countries, but may also be transferred outside the European Union. With reference to the transfer outside the European Union territory to countries not considered as adequate by the European Commission, FRIEM implements suitable and appropriate safety measures in order to protect personal data.

Therefore, the possible transfer of personal data to countries outside the European Union territory shall take place in accordance with the appropriate and suitable guarantees for such transfer, such as the standard contractual clauses for data protection, in compliance with the applicable regulation and in particular with Articles 45 and 46 of the Privacy Regulation.

In any event the data subject has the right to obtain the relevant information as to the appropriate or suitable guarantees implemented for the transfer of personal data and the means to obtain a copy of such personal data or the place where they have been made available.



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6. Rights of the data subject

The data subject can, at any time and at no cost, by sending an email to privacy@FRIEM.com, exercise the following rights:

- to obtain from FRIEM the confirmation as to the existence of data that concern them, and to be informed as to the contents and source of these data, to verify their accuracy, and to request their integration, update or modification;
- to obtain the erasure, the anonymisation or the block of the data where their processing does not comply with the applicable regulation;
- to oppose, partially or wholly, for legitimate reasons, the processing; and
- to revoke, at any time, consent to the processing of data (where such consent to processing may be applicable), without prejudice whatsoever as to the lawfulness of the processing based on consent given prior to such revocation.

In addition to such rights, the data subject also has the right, which can be exercised at any time, to:

- ask FRIEM to limit its treatment of their personal in the event that:
 - the data subject challenges the precision of their data, for the period necessary to FRIEM to verify the precision of such data;
 - the processing is unlawful and the data subject opposes erasure of their data but requests instead a limitation of their use;
 - FRIEM no longer needs the data for processing, however the data are necessary to FRIEM for the verification, execution or defense of a right in a court of law; or
 - the data subject opposes the processing pursuant to Article 21 paragraph 1 of the Privacy Regulation whilst awaiting verification as to the possible prevailing of legitimate and mandatory reasons on the part of FRIEM to continue processing of the data.
- oppose the treatment of their data;
- ask for the erasure of personal data in a timely manner;
- submit a claim to the Data Protection Authority.



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7. Terms of Data Storage

Personal data will be stored for the period of time necessary to achieve the purposes for which such data were collected, as stated in this policy. In any case, the following terms of storage shall apply, with reference to the processing of personal data, for the purposes that are stated below:

- for Contractual Purposes and Legitimate Interests Purposes as per Section 2 from a) to c), Personal Data are stored for a period equal to the length of the contract (included possible renewals) and for the 10 years following the termination, resolution or withdrawal from the contract, except in the cases where a longer period of storage may be required for possible litigations, requests from relevant authorities, or pursuant to the applicable regulation.

8. Claims

If the data subject believes that the processing of their personal data has been unlawfully performed, a claim can be submitted to one of the supervisory authorities in charge of compliance with the regulations related to the protection of personal data.

In Italy, this claim can be submitted to the Garante per la Protezione dei Dati Personali (Data Protection Authority). More information on how to submit a claim are available on the authority website: www.garanteprivacy.it.

9. Modifications and updates

The policy may be subject to modifications and integrations, also following any update to the applicable regulation on the processing of personal data. Clients shall receive advance notification of such modifications and will be able to view the text of the regularly updated policy on the company website.