



Progress Profiles SpA Via Le Marze, 7 31011 ASOLO (TV) Italy Tel. +39 0423 950398 Fax +39 0423 950979 Azienda certificata UNI EN ISO 9001:2015 P.I. IT 03481880262 - R.E.A. TV 275319 C.F. e Iscr. Reg. Impr. TV 03481880262 Cap. soc. € 120.000,00 i.v. N. Meccanografico TV 44685

# PROGRESS PROFILES ACADEMY

# INFORMATION AND CONSENT FOR THE PROCESSING OF PERSONAL DATA Regulation EU 679/2016 Artt. 4,6,7 and 13

INFORMATION Art. 13 Regulation EU 679/2016 Information relating to personal data collected from the data subject during technical training at Progress Profiles

The Company PROGRESS PROFILES SpA, as Data Controller, informs all interested parties that pursuant to art. 13 EU Regulation n. 2016/679 ("GDPR") the collected data will be processed in the following ways and for the following purposes:

#### I. SUBJECT MATTER OF THE PROCESSING

The Data Controller informs that, in order to be able to pursue an effective training and training activity for potential sellers, designers, craftsmen (henceforth all subjects classified as "interested") who intend to acquire the best techniques for installing Progress Profiles products. Membership in this training and training program include following activities:

- Registration of personal data relating to the learner for the organization of training activities;
- Issuance of identification cards as a qualified expert for installing Progress Profiles products (with release for use of personal photos) and discounts reserved at our dealers;
- Group photos, for which discharge will be signed and can be published on corporate social media;
- Sending communications on Webinars and updates on our products through web platforms;

#### II. DATA CONTROLLER

The Data Controller is PROGRESS PROFILES SpA, with registered office at 31011 ASOLO (TV) Via Le Marze, 7 - Telephone 0423-950398 Fax 0423-950979 mail: info@progressprofiles.com, website www.progressprofiles.com

The updated list of data managers and handlers is kept at the registered office of the Data Controller.

#### III. DATA PROTECTION OFFICER (DPO or DPO)

According to art. 37 of the EU Regulation 679/2016, the Data Controller, in the fullness of his powers, has appointed RPD the Company GESIAV CONSULTING SrI with registered office at 35042 ESTE (PD) Via G.B. Brunelli,12 Tel. 0429-670680 Fax 0429-677322 Contact person: BISSARO RENATO (DPO)

Mail for each type of communication or report: privacydpo@progressprofiles.com

## IV. PURPOSE OF PROCESSING AND LEGAL BASIS OF PROCESSING

Your personal data are processed in compliance with the lawfulness of Art. 6 Regulation EU 679/2016, with regard to:

- a) Without the consent of the data subject:
- Conclude contracts for all direct supplies of the Holder;
- Fulfil pre-contractual, contractual and tax obligations arising from existing relationships as customers;
- To fulfil the obligations laid down by law or by a regulation or by Community legislation;
- Exercise the rights of the Data Controller, for example the right of defence in court;
- b) With the consent of the data subject:
  - b.1 Registration of personal data relating to the learner for the organization of training activities;
  - b.2 Issue of identification cards as a qualified expert for the installation of Progress Profiles products (with release for the use of personal photos) and discounts reserved at our dealers;
  - b.3 Group photos, for which discharge will be signed and can be published on corporate social media;
  - b.4 Sending webinars and updates about our products via web platforms;

In any case, personal data will be stored for a period of time not exceeding that strictly necessary to achieve the purposes indicated. Personal data whose storage is not necessary for the purposes indicated will be deleted or transformed into an anonymous form.

Please note that in the absence of consent where mandatory, we will not be able to carry out the planned training activity, nor send all subsequent technical and commercial information, for the continuous updating of the interested parties.











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The data collected by the Data Controller are not subject to an automated decision-making process, including profiling pursuant to art. 22 paragraphs 1 and 4

## V. RIGHTS OF THE DATA SUBJECT

Art. 15 of the EU Regulation 679/2016 regulates the information that the interested party can request from the Data Controller

The interested party may decide not to provide any data or to subsequently deny the possibility of processing for these purposes data already provided, first expressing the intention that data such as images or personal photos are not taken in any direct way.

Based on the types of consent expressed below, the interested party may receive newsletters, commercial communications and advertising material related to the services and products offered by the Data Controller excluding the processing of data as indicated in point IV letter a)

The data subject has the right to ask the Data Controller, when he has an interest, access to personal data or the rectification or cancellation thereof or the restriction of the processing of data concerning him or her or to oppose their processing, in addition to the right to data portability

The data subject has the right to revoke the consent at any time where he has already given it, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal (Ref. Art. 6 paragraph 1, lett. a and Art. 9, paragraph 2 lett. a of Regulation EU 679/2016)

The data subject has the right to receive information from the Data Controller before any action of the same time to a type of processing other than that for which the data were collected;

Where applicable, the data subject also has the rights referred to in art. 16-21 GDPR (right to be forgotten, right to object);

The data subject has the right to lodge a complaint with a supervisory authority;

#### VI. METHODS OF TREATMENT

The processing of your personal data is carried out through the operations indicated in art. 4 paragraph 2 of EU Regulation 679/2016, namely: any operation or set of operations, performed with or without the aid of registration, organization, structuring, conservation, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, cancellation or destruction.

Your personal data are subject to both paper and electronic and/or automated processing.

The processing is carried out by persons in charge and specially appointed collaborators within the respective functions and in accordance with the instructions received, always and only for the achievement of the specific purposes scrupulously respecting the principles of confidentiality and security required by the applicable rules.

#### VII. ACCESS TO DATA

Your data may be made accessible for the purposes referred to in point V and VI:

To the employees and collaborators of the Data Controller in their capacity as internal processors and/or processors and/or system administrators;

To third-party companies or other subjects (as an indication, professional firms, consultants, insurance companies, advertising agencies, etc.) that carry out outsourcing activities on behalf of the Data Controller, in their capacity as external data processors, the list of which is available at our headquarters.

#### VIII. COMMUNICATION OF DATA

Without the need of an express consent, the Data Controller may communicate its data for the purposes referred to in point IV 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. Your data will not be disseminated.

#### IX. TRANSFER OF DATA

Your data is not transferred outside the European Union. It remains in any case understood that the Data Controller, if necessary, will have the right to transfer the data in the European Union and/or in non-EU countries to other Subsidiaries. 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.











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#### X. RETENTION OF DATA

The Data Controller will process the data for the time strictly necessary to fulfil the purpose referred to in point IV, up to a maximum duration of 2 (two) years, renewable for the same period.

All personal data provided will be processed in compliance with the principles of lawfulness, fairness, relevance and proportionality, only in the manner, including computer and telematics, It should be noted that the information systems used for the management of the information collected are configured, from the outset, so as to minimize the use of personal data.

## XI. PROCEDURES FOR EXERCISING RIGHTS

Please note that each Data Subject may at any time exercise their rights regarding Privacy by sending an e-mail to privacydpo@progressprofiles.com

# **DECLARATION of CONSENT**

Artt. 4,6,7 Regulation EU 679/2016
I, the undersigned,
On behalf of
declare to have read and understood the information provided pursuant to art.13 of the EU Regulation 679/2016 and aware, in particular, that the processing will concern the "personal data" referred to in art 4, paragraph 1 of the aforementioned Regulation, namely "any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person who may be identified, directly or indirectly, with particular reference to an identifier such as name, identification number, location data, an online identifier or one or more elements characteristic of its physical, physiological, genetic, psychological, economic, cultural or social identity"
GIVES
Its free, specific, informed and unequivocal will, with which it expresses its consent to the processing, also with IT and/or telematic tools, of personal data limited to:
Point IV: Lett. b.1) YES NO Lett. b.2) YES NO Lett. b.3) YES NO Lett. b.4) YES NO
as well as points VI, VII, VIII, IX, X of this 4-page policy, for due administrative obligations and for all other related activities, including the communication of data in the forms and ways indicated in the information that concern the subjects of their organization identified as "interested" and for which it is always allowed at any time the right of opposition according to art. 21 of Regulation EU 679/2016.
Data Signature





