



**PRIVACY POLICY FOR CUSTOMERS,
SUPPLIERS AND VISITORS**
("Privacy Policy")

Version:	000
Date:	may 2018
Prepared by:	Gianluca Passuti
Approved by:	President of the Board of Directors

1. Data controller:	O.M.P. Officine Mazzocco Pagnoni S.r.l. ("Company"), information about which is provided in the footer of the Company website found at the URL https://www.omppumps.com/ , is committed to protecting personal data in accordance with (a) Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC ("GDPR") as well as (b) Italian legislation on personal data protection ("National Data Protection Laws").
2. Authorized persons within the company involved in data processing	The persons within the Company involved in data processing have been authorized and appropriately instructed.
3. Data processors/ recipients of the data:	Data can be disclosed to data processors who process data based on previous agreements with the Company. Data processors belong to the following categories: security guard service providers; suppliers of software and related technical support/maintenance services; accounting and tax consultants; workplace safety consultants; banks/credit institutions. In addition data may be disclosed to third parties, acting as independent data controllers, such as for example: supervisory bodies; certification entities and bodies; subjects to whom disclosure is mandatory by law. The Company provides specific information on data processors and recipients, at the request of the data subject.
4. Data subjects:	1) Customers (including potential customers) – either natural persons or representatives of customer legal entities - that have business relationships with the Company. 2) Suppliers (including potential suppliers) – either natural persons or representatives of supplier legal entities - that have business relationships with the Company; professionals and consultants; representatives of contractors/subcontractors; personnel of suppliers/contractors/subcontractors. 3) Visitors who have access - for any reason whatsoever – to business premises of the Company, whether or not following the registration procedure at the front office and who may be granted to the wi-fi access, through the signature of the respective form.



**PRIVACY POLICY FOR CUSTOMERS,
SUPPLIERS AND VISITORS**
("Privacy Policy")

Version:	000
Date:	may 2018
Prepared by:	<i>Gianluca Passuti</i>
Approved by	<i>President of the Board of Directors</i>

5.	Personal data processed:	<p>1) The data processed consist of common data, such as, for example, the name and surname of the legal representative or owner, name or registered name of the entity, tax code, VAT number, legal and tax domicile, complete contact details, physical address and telephone (also mobile phone) numbers, fax, certified email and email address, postal code and in general information necessary for the performance of the contract, such as bank account details and/or data relating to the payment/collection system.</p> <p>2) In addition to the above data, the Company may process the following data, concerning the personnel of suppliers/contractors/subcontractors: (a) registration number, company/entity to which personnel belongs, remuneration, qualification, level of qualification, social security and insurance data, any other data contained in the payslips, documents attesting qualifications and the ability to perform certain activities; (b) particular categories of data, such as for example, data contained in health certificates attesting the ability to perform job-related tasks and duties.</p> <p>3) With regard to visitors that have internet access through wi-fi, the Company may process the IP address of the device used by any visitor.</p>
-----------	---------------------------------	--



**PRIVACY POLICY FOR CUSTOMERS,
SUPPLIERS AND VISITORS**
("Privacy Policy")

Version:	000
Date:	may 2018
Prepared by:	<i>Gianluca Passuti</i>
Approved by	<i>President of the Board of Directors</i>

6. Purposes of data processing	<p>1) Data processing is carried out to establish and perform contracts with customers and suppliers, as well as to fulfil legal obligations.</p> <p>2) Data processing relating to personnel of suppliers/contractors/subcontractors is carried out to verify the possession of certifications concerning qualifications and the ability to perform certain activities as well as for the protection of the Company with respect to legally established joint liability.</p> <p>3) Unless objection is made by the Company's customers, data is also processed to send commercial communications about the Company's products similar to those already subject to a previous commercial relationship ("Opt-out").</p> <p>4) Data processing relating to visitors that have internet access through wi-fi is carried out to enable the visitors' devices to connect to wi-fi, to meet related security needs and to protect the Company's assets and also for defensive purposes.</p> <p>5) Common data of data subjects can also be processed for purposes of verification and control in relation to the obligations deriving from Legislative Decree n.231/01 on the administrative responsibility of companies and entities.</p>
7. Legal basis of the processing	<p>The processing of data is necessary for the performance of a contract or to fulfil legal obligations.</p> <p>The processing of data relating to personnel of suppliers/contractors/subcontractors is carried out to fulfil legal obligations as well as to pursue the legitimate interest of the Company.</p>



**PRIVACY POLICY FOR CUSTOMERS,
SUPPLIERS AND VISITORS**
("Privacy Policy")

Version:	000
Date:	may 2018
Prepared by:	<i>Gianluca Passuti</i>
Approved by	<i>President of the Board of Directors</i>

8.	Data retention period	<p>Personal data of customers/suppliers and their representatives are retained for the entire duration of the contractual relationship and are cancelled ten years and six months after the termination of the same for defensive purposes, unless there is an objection/dispute, in which case the data will be kept for the time necessary to exercise the right of defence and to manage/resolve the dispute.</p> <p>The data referred to in point 2) of paragraph 5 (Personal data processed) relating to the personnel of suppliers/contractors/subcontractors will be cancelled after three years from the termination of the contract, unless an objection/dispute has arisen, in which case the data will be kept for the time necessary to exercise the right of defence and manage/resolve the dispute.</p> <p>The data processed for the purposes referred to in point 3) of paragraph 6 (Purposes of data processing) are retained until the Opt-out has been exercised by data subjects.</p> <p>The data processed for the purposes referred to in point 4) of paragraph 6 (Purposes of data processing) are retained for three years from the end of the month during which visitors have had internet access through wi-fi. The IP address is processed for the entire duration of the wi-fi connection.</p>
9.	Optional/mandatory nature of the provision of data	<p>The provision of data by data subjects is necessary to allow the Company to fulfil its legal obligations as well as its contractual obligations or to respond to pre-contractual requests. Any refusal to provide personal data, in whole or in part, will not allow the Company to respond to the request, to perform the contract and/or to comply with legal obligations.</p>
10.	Data transfer abroad	<p>Personal data of representatives of suppliers may be transferred outside the EU to manage project development activities with regard to customers when said customers are located in extra EU countries. The transfer will take place, in any case, only after verification of compliance with the provisions contained in articles 44 and following of the GDPR and, in particular, upon the previous communication concerning the extra EU country in question and the appropriate safeguards according to the GDPR provisions.</p>



**PRIVACY POLICY FOR CUSTOMERS,
SUPPLIERS AND VISITORS**
("Privacy Policy")

Version:	000
Date:	may 2018
Prepared by:	<i>Gianluca Passuti</i>
Approved by:	<i>President of the Board of Directors</i>

11. Rights	To exercise the rights provided for by applicable National Data Protection Laws and the GDPR (articles 15 et seq.), data subjects may contact the Company or Company's data processors if any, in particular, in order to access their personal data, request the rectification, updating, cancellation or limitation of said data, as well as to request the portability of said data; the Company may be contacted using contact details as set out above.
12. Right to object	With the same procedures described above, data subjects may object, in whole or in part, to the processing of their personal data, where the relevant legal basis is constituted by the legitimate interest of the Company, pursuant to and for the purposes of the provisions of Article 21 of the GDPR.
13. Complaint	Any data subject who believes that the processing of data concerning him or her is in violation of the GDPR, in accordance with the provision of article 77 of the GDPR, may lodge a complaint with a supervisory authority where the data subject usually lives or works or with a supervisory authority where the alleged infringement has occurred.
14. Withdrawal of consent	The data processing referred to herein is not legally based on consent, therefore the withdrawal of consent has not been provided for.
15. Updates and revisions	The Company reserves the right to modify and/or update the Privacy Policy, also taking into account any subsequent additions and/or amendments to national and/or EU legislation regarding the protection of personal data or consequent to any new purposes of data processing that may arise. For this reason, the Privacy Policy is published with a progressive identification number and the month of publication, starting from the May 2018 version, which bears the number "00". The new versions of the Privacy Policy will replace the previous ones and will be valid, effective and applied starting on the date of publication on the Company website or the date of communication to the data subjects.