

## Customer privacy policy

Under art. 13 of EU Regulation no. 2016/679 (GDPR), in the interests of transparency, we provide the following information to inform FRIULAIR S.r.l. Customers about our data processing methods.

### a) Data Controller identity and contact details

We inform you that your data will be processed by FRIULAIR S.r.l. as Data Controller. The Data Controller can be contacted at the following email address: [privacy@friulair.com](mailto:privacy@friulair.com) and at its registered office in via Cisis,36 - 33052 Cervignano del Friuli (UD).

### b) Processing purposes, legal basis and legitimate interest

Personal Data is processed for the following purposes:

1. fulfilling obligations arising from the service contract to which the Customer is a party;
2. fulfilling specific Customer requests before the service contract execution;
3. managing customers, contracts, orders and invoices, after-sales service;
4. quality management, activity planning and customer satisfaction surveys;
5. managing any disputes arising from contractual liability;
6. fulfilling legal obligations related to civil, tax and accounting provisions.

The processing basis for the purposes referred to in points 1 and 2 is to complete the contract and the processing necessary for its performance and pre-contractual measures at the customer's request.(art. 6 no. 1 letter B - GDPR).

The processing for the purposes referred to in points 3 ,4 and 5 is necessary to pursuit the Data Controller legitimate interest to comply with the contractual obligations entered into with the Customer and exercise its right of defence (art.6 no. 1 letter f - GDPR). The processing for the purposes referred to in point 6 has, as its legal basis, the need to comply with legal obligations (art.6 no. 1 letter C - GDPR).

### c) Personal data recipients and any categories of recipients

Data is processed by those authorised under the responsibility of the Data Controller for the above purposes using manual and electronic tools, with organisational and processing logics that are strictly related to the objectives.

Data may be sent to third parties who provide instrumental services such as legal, tax and commercial consulting companies, technical computer services, communication and email services, commercial agents, banks and credit institutions. In addition, an updated list of all recipients and any external data processors is available at the Data Controller's offices.

### d) Transfer of data to third countries

The Data Controller will not transfer the data to a third country or international organisation.

### e) Data retention period

Data is kept in paper or electronic format for the period necessary to achieve the purposes for which it was collected and under legal obligations.

### f) Data rights

The Customer has personal data access rights, if requirements are met, under Article 15 of EU Regulation 2016/679 and the rights provided for in Articles 16, 17, 18, 21 of EU Regulation 2016/679 to rectify, erase, limit processing and the right to object under Art. 12 of the EU Regulation 2016/679.

The data subject may exercise their rights by submitting a request by written communication to the email address: [privacy@friulair.com](mailto:privacy@friulair.com).  
The data protection rights form is available on the following website: <https://www.garanteprivacy.it/HOME/MODULISTICA-E-SERVIZI-ONLINE>.

**g) Complaint**

If you believe that your personal data processing is violating the provisions of EU Regulation 2016/679, you have the right to complain to the Data Protection Authority (Garante Privacy).

**h) Provision of Data**

We inform you that the communication of personal data for the purposes referred to in point b) is a legal or contractual obligation or a necessary requirement for the contract completion. Any refusal to provide certain data may make it impossible to perform the contract to which the Customer is a party.

Cervignano del Friuli, 11/10/2021

Legal Representative