

## PRIVACY POLICY FOR WEBSITE USERS

### Articles 13 and 14 – GDPR (EU/2016/679)

Pursuant to Articles 13 and 14 of Regulation (EU) 679/2016 on the protection of personal data (GDPR), we hereby inform you that the personal data you provide may be handled in compliance with the following privacy policy.

#### **DATA CONTROLLER**

The Data Controller is G.M. International S.r.l., VAT no. 02312650969, with registered office in Corso di Porta Vittoria 28, 20122 Milano (MI), Italy, and administrative offices in Via G. Mameli 53/55 - 20852 Villasanta (MB), Italy, which may be contacted at the email address [privacy@gminternational.com](mailto:privacy@gminternational.com), at the telephone number +39 039 2325038, or via fax at +39 039 2325107.

#### **HANDLING OF DATA**

Personal data will be gathered as provided by you as a part of using the various areas of the website as listed below:

##### **1. Area: E-mail**

The data provided by you via the email addresses made available on the site will be handled as follows:

<b>PURPOSE</b>	for fulfilling your requests.
<b>LEGAL FRAMEWORK</b>	- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the explicit and voluntary provision of personal data using the email addresses made available on the site entails the lawful acquisition of the sender's contact information needed to reply, as well as of all personal data included in said communications.
<b>PERIOD OF DATA STORAGE</b>	The data provided will be kept for the time necessary to fulfill your request.
<b>DISCLOSURE OF DATA TO PARTIES OTHER THAN THE DATA CONTROLLER</b>	- Data processors under the authority of the Data Controller; - Data processors designated by the Data Controller.

##### **2. Area: Contact form**

The data you submit via the form will be handled as follows:

<b>PURPOSE</b>	for fulfilling your requests.
<b>LEGAL FRAMEWORK</b>	- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the explicit and voluntary provision of personal data using the form on the site entails the lawful acquisition of the sender's contact information needed to reply, as well as of all personal data included in said communications; - Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the data subject has requested, in explicit and voluntary manner, to receive the newsletter from G.M. International s.r.l.
<b>PERIOD OF DATA STORAGE</b>	The data provided will be kept for the time necessary to fulfill your request.
<b>DISCLOSURE OF DATA TO PARTIES OTHER THAN THE DATA CONTROLLER</b>	- Data processors under the authority of the Data Controller; - Data processors designated by the Data Controller.

##### **3. Area: Webinars – Request form**

The data you submit via the form will be handled as follows:

<b>PURPOSE</b>	for fulfilling your requests related to webinars.
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<b>LEGAL FRAMEWORK</b>	<ul style="list-style-type: none"> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the explicit and voluntary provision of personal data using the form on the site entails the lawful acquisition of the sender's contact information needed to reply, as well as of all personal data included in said communications;</li> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the data subject has requested, in explicit and voluntary manner, to receive the newsletter from G.M. International s.r.l.;</li> <li>- Article 6, paragraph 1, letter a), of the GDPR: the data subject has given consent to the sending of informational and commercial material relating to the services of G.M. International s.r.l.;</li> <li>- Article 6, paragraph 1, letter a), of the GDPR: the user has given consent to the disclosure of personal data to other companies within the GM International group in order to fulfill the request.</li> </ul>
<b>PERIOD OF DATA STORAGE</b>	The data provided will be kept for the time necessary to fulfill your request.
<b>DISCLOSURE OF DATA TO PARTIES OTHER THAN THE DATA CONTROLLER</b>	<ul style="list-style-type: none"> <li>- Data processors under the authority of the Data Controller;</li> <li>- Data processors designated by the Data Controller;</li> <li>- Other companies within the G.M. International group.</li> </ul>

#### 4. Area: Reserve your seat for the webinar

The data you submit via the form will be handled as follows:

<b>PURPOSE</b>	to allow you to sign up for our webinars.
<b>LEGAL FRAMEWORK</b>	<ul style="list-style-type: none"> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the data subject has signed up for the webinar in an explicit and voluntary manner;</li> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the data subject has requested, in explicit and voluntary manner, to receive the newsletter from G.M. International s.r.l.</li> </ul>
<b>PERIOD OF DATA STORAGE</b>	The data provided will be kept for the time necessary for the organization and management of the webinar.
<b>DISCLOSURE OF DATA TO PARTIES OTHER THAN THE DATA CONTROLLER</b>	<ul style="list-style-type: none"> <li>- Data processors under the authority of the Data Controller;</li> <li>- Data processors designated by the Data Controller.</li> </ul>

#### 5. Area: Signing up for our newsletter

The data you provide in the newsletter area will be handled as follows:

<b>PURPOSE</b>	To provide you with information via the newsletter.
<b>LEGAL FRAMEWORK</b>	<ul style="list-style-type: none"> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the explicit and voluntary provision of personal data in order to receive the newsletter from G.M. International s.r.l.</li> </ul>
<b>PERIOD OF DATA STORAGE</b>	The data provided will be kept until you request to deactivate the service.
<b>DISCLOSURE OF DATA TO PARTIES OTHER THAN THE DATA CONTROLLER</b>	<ul style="list-style-type: none"> <li>- Data processors under the authority of the Data Controller;</li> <li>- Data processors designated by the Data Controller.</li> </ul>

#### 6. Area: Making a quote

The data you provide via the forms for requesting a quote will be handled as follows:

<b>PURPOSE</b>	To provide you with the quote requested.
<b>LEGAL FRAMEWORK</b>	<ul style="list-style-type: none"> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the data subject has optionally and explicitly submitted a request for a quote;</li> </ul>

	<ul style="list-style-type: none"> <li>- Article 6, paragraph 1, letter a), of the GDPR: the user has given consent to the disclosure of personal data to other companies within the GM International group in order to fulfill the request.</li> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the data subject has requested, in explicit and voluntary manner, to receive the newsletter from G.M. International s.r.l.</li> <li>- Article 6, paragraph 1, letter a), of the GDPR: the data subject has given consent to the sending of informational and commercial material relating to the services of G.M. International s.r.l.</li> </ul>
<b>PERIOD OF DATA STORAGE</b>	The data provided will be kept until your request is fulfilled.
<b>DISCLOSURE OF DATA TO PARTIES OTHER THAN THE DATA CONTROLLER</b>	<ul style="list-style-type: none"> <li>- Data processors under the authority of the Data Controller;</li> <li>- Data processors designated by the Data Controller;</li> <li>- Other companies within the G.M. International group.</li> </ul>

### 7. Area: Creating an account

The data you submit via the forms used to create a personal user account will be handled as follows:

<b>PURPOSE</b>	<ul style="list-style-type: none"> <li>- creation and management of the personal user account;</li> <li>- access to the personal area of the G.M. International website;</li> <li>- placing orders;</li> <li>- downloading content from our website.</li> </ul>
<b>LEGAL FRAMEWORK</b>	<ul style="list-style-type: none"> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the data subject has optionally and explicitly created a personal user account;</li> <li>- Article 6, paragraph 1, letter a), of the GDPR: the user has given consent to the disclosure of personal data to other companies within the GM International group in order to manage the contractual relationship and make direct sales;</li> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the data subject has requested, in explicit and voluntary manner, to receive the newsletter from G.M. International s.r.l.</li> <li>- Article 6, paragraph 1, letter a), of the GDPR: the data subject has given consent to the sending of informational and commercial material relating to the services of G.M. International s.r.l.</li> </ul>
<b>PERIOD OF DATA STORAGE</b>	The data provided will be kept until you request the deletion of your personal account.
<b>DISCLOSURE OF DATA TO PARTIES OTHER THAN THE DATA CONTROLLER</b>	<ul style="list-style-type: none"> <li>- Data processors under the authority of the Data Controller;</li> <li>- Data processors designated by the Data Controller;</li> <li>- Other companies within the G.M. International group.</li> </ul>

### 8. Area: SIL MANUAL – Requesting a print copy

The data you submit via the form will be handled as follows:

<b>PURPOSE</b>	To allow you to purchase and receive the print copy of the SIL MANUAL
<b>LEGAL FRAMEWORK</b>	<ul style="list-style-type: none"> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the data subject has requested, in explicit and voluntary manner, to receive a print copy of the manual;</li> </ul>

	<ul style="list-style-type: none"> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the data subject has requested, in explicit and voluntary manner, to receive the newsletter from G.M. International s.r.l.;</li> <li>- Article 6, paragraph 1, letter a), of the GDPR: the user has given consent to the disclosure of personal data to other companies within the GM International group in order to fulfill his or her request;</li> <li>- Article 6, paragraph 1, letter a), of the GDPR: the data subject has given consent to the sending of informational and commercial material relating to the services of G.M. International s.r.l.</li> </ul>
<b>PERIOD OF DATA STORAGE</b>	The data provided will be kept for the time necessary to fulfill your request.
<b>DISCLOSURE OF DATA TO PARTIES OTHER THAN THE DATA CONTROLLER</b>	<ul style="list-style-type: none"> <li>- Data processors under the authority of the Data Controller;</li> <li>- Data processors designated by the Data Controller;</li> <li>- Other companies within the G.M. International group;</li> <li>- Transport company for the delivery of the purchased manual.</li> </ul>

#### 9. Area: Authorization for return of materials

The data you provide via the material-return authorization form on the site will be handled as follows:

<b>PURPOSE</b>	for fulfilling your requests for the return of materials.
<b>LEGAL FRAMEWORK</b>	<ul style="list-style-type: none"> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the data subject has requested a materials return in an explicit and voluntary manner;</li> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the data subject has requested, in explicit and voluntary manner, to receive the newsletter from G.M. International s.r.l.;</li> <li>- Article 6, paragraph 1, letter a), of the GDPR: the user has given consent to the disclosure of personal data to other companies within the G.M. International group in order to manage his or her request.</li> </ul>
<b>PERIOD OF DATA STORAGE</b>	The data provided will be kept for the time necessary to fulfill your request.
<b>DISCLOSURE OF DATA TO PARTIES OTHER THAN THE DATA CONTROLLER</b>	<ul style="list-style-type: none"> <li>- Data processors under the authority of the Data Controller;</li> <li>- Data processors designated by the Data Controller;</li> <li>- Other companies within the G.M. International group.</li> </ul>

#### 10. Area: Support

The data you submit via the form in the support section will be handled as follows:

<b>PURPOSE</b>	for responding to and resolving any doubts and/or other issues.
<b>LEGAL FRAMEWORK</b>	<ul style="list-style-type: none"> <li>- Article 6, paragraph 1, letter f), of the GDPR, legitimate interest: the explicit and voluntary provision of personal data using the form made available on the site entails the lawful acquisition of the sender's contact information needed to reply, as well as of all personal data included in said communications;</li> <li>- Article 6, paragraph 1, letter a), of the GDPR: the user has given consent to the disclosure of personal data to other companies within the GM International group in order to manage his or her request.</li> </ul>
<b>PERIOD OF DATA STORAGE</b>	The data provided will be kept for the time necessary to fulfill your request.
<b>DISCLOSURE OF DATA TO PARTIES OTHER THAN THE DATA CONTROLLER</b>	<ul style="list-style-type: none"> <li>- Data processors under the authority of the Data Controller;</li> </ul>

	<ul style="list-style-type: none"><li>- Data processors designated by the Data Controller;</li><li>- Other companies within the G.M. International group.</li></ul>
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Any designated Data Processors will be bound to the confidentiality and security of the data by contract, and an updated list of such Data Processors may be obtained from the Data Controller at any time.

### **RIGHTS OF THE DATA SUBJECT**

To assert your rights, as provided for by Article 15 of the GDPR *et seq.*, you may contact the Data Controller as specified above, identifying yourself and specifying the nature of the request or the issue concerned.

You may exercise the following rights concerning your data:

- Access
- Corrections
- Elimination
- Restrictions
- Objection to processing

For processing subject to consent, the data subject has the right to withdraw consent at any time. Withdrawal of consent shall not affect the lawfulness of processing prior to its withdrawal.

The exercise of certain of the aforementioned rights could hinder G.M. International S.r.l. in the processing of data required for the management of the relationship, with the consequence that it may be impossible to provide the service.

### **TRANSFER OF DATA TO OTHER COUNTRIES**

To process your requests and fulfill the services, it may be necessary to disclose your personal data to the other companies belonging to the G.M. International S.r.l. group, located outside the European Union, based on the guarantees of the adequacy decision (Article 45 of the GDPR) or on the standard contractual clauses of the European Commission (Article 46, paragraph 2, letter C, of the GDPR), which may be obtained from the Data Controller at the contact addresses indicated above.

### **RIGHT OF COMPLAINT**

If you believe that the processing of the data provided violates legislation concerning the protection of personal data, you have the right to lodge a complaint with the Italian supervisory authority, which is based in Piazza Venezia 11 - 00186 Rome (Italy) – Tel. +39.06.696771 - Email: [protocollo@gmdp.it](mailto:protocollo@gmdp.it).