

PRIVACY NOTICE | Articles 13-14 of EU Regulation 2016/679

MODULBLOK S.p.A. (hereinafter also referred to as "**MODULBLOK**"), pursuant to Art. 24 of EU Regulation 2016/679 (hereinafter "**GDPR**"), acts as the **Data Controller** and, in implementation of Articles 13-14 of the GDPR, provides the following information:

1. DATA CONTROLLER

- **Company Name:** Modulblok SpA
- **VAT Number:** IT00812590305
- **Registered Office:** Via Vanelis, 6 Pagnacco (UD) 33010
- **Operational Headquarters:** Via Candoni, 5 Amaro (UD) 33020
- **Telephone:** 0432-661711
- **Email:** info@modulblok.it
- **Certified Email (PEC):** pec.modulblok@pec.modulblok.it

2. Purposes of Processing and Legal Basis

The Controller processes the following types of data provided directly, voluntarily, and spontaneously via email and/or provided directly by the data subjects.

PURPOSE	DATA PROCESSED	LEGAL BASIS
a) Management of customer data (natural persons and/or legal entities). Compliance with tax and accounting obligations for customers	By way of example and not limited to: company name, first and last name, registered office address, personal address, landline and mobile phone numbers, fax, e-mail address, PEC (certified email) address, tax data, tax code (CF), and bank details.	Performance of a contract to which the data subject is party. Art. 6, para. 1, letter b) GDPR Processing is necessary for compliance with a legal obligation to which the controller is subject, as provided for by law, regulation, EU legislation, or an order from an Authority, including Accounting and/or Tax matters. Art. 6, para. 1, letter c) GDPR
b) Management of supplier data. Compliance with tax and accounting obligations for suppliers.	By way of example and not limited to: company name, first and last name, registered office address, personal address, landline and mobile phone numbers, fax, e-mail address, PEC (certified email) address, tax data, tax code (CF), and bank details.	Performance of a contract to which the data subject is party. Art. 6, para. 1, letter b) GDPR Processing is necessary for compliance with a legal obligation to which the controller is subject, as provided for by law, regulation, EU legislation, or an order from an Authority, including Accounting and/or Tax matters. Art. 6, para. 1, letter c) GDPR
c) Management of data from spontaneous applications submitted by potential collaborators.	When submitting their CV, the candidate may provide—in addition to personal and contact details— data pursuant to Art. 9, para. 1	The data subject has given consent to the processing of his or her

	(special categories of personal data) and Art. 10 (personal data relating to criminal convictions and offences).	personal data. Art. 6, para. 1, letter a) GDPR
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1. Methods and Duration of Processing

Personal data processing is carried out through the operations indicated in **Art. 4, def. 2) GDPR**, specifically: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, erasure, and destruction of data. Data provided spontaneously and voluntarily are processed both in paper and electronic formats.

Personal data will be stored for the time strictly necessary to achieve the specific purposes of the processing, in addition to periods defined by current regulations, specifically:

- **a)** For the purposes indicated in **Art. 1, letters a) and b)**: for the time necessary to fulfill contractual obligations and, in any case, **not beyond 10 years** from the time of data collection for the fulfillment of regulatory obligations;
- **b)** For the purposes indicated in **Art. 1, letter c)**: for **6 months** from the time the data is provided.

2. Access and Communication of Data

Data may be communicated and made accessible for the purposes referred to in Art. 1 to:

- **a)** Employees and collaborators of the Controller, in their capacity as **authorized personnel**;
- **b)** Third parties for essential technical management of the technological infrastructure, maintenance of management software, and archive storage, in their capacity as **External Data Processors** appointed and instructed pursuant to **Art. 28 GDPR**;
- **c)** Third parties performing professional outsourcing activities on behalf of the Controller, in their capacity as **External Data Processors** appointed and instructed pursuant to **Art. 28 GDPR**;
- **d)** Judicial authorities and all other subjects to whom communication is mandatory by law for the fulfillment of the purposes referred to in Art. 1.

Data will not be subject to dissemination.

3. Data Transfer

The management and storage of personal data take place on servers located within the **European Union**. Data will not be transferred outside the European Union.

4. Rights of the Data Subject

Articles 15 to 23 of the GDPR list the user's rights. In relation to the personal data covered by this notice, the data subject has the right to exercise the following rights provided by the GDPR:

Modulblok S.p.a.	Head Office Via Vanelis 6 33010 Pagnacco UD Italy +39 0432 661711	Factory Via P. Candoni 5 33020 Amaro UD Italy +39 0432 661799	Cap. Soc. € 3.060.000,00 i.v. C.F. e P. IVA IT00812590305 REA n. 177301 CCIAA UD info@modulblok.it modulblok.com
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- **a) Right of access [Art. 15 GDPR]:** The right to be informed about the processing of one's Personal Data and, if necessary, receive a copy;
- **b) Right to rectification [Art. 16 GDPR]:** The right to obtain the correction of inaccurate personal data;
- **c) Right to erasure ("Right to be forgotten") [Art. 17 GDPR]:** The right to have one's data deleted without undue delay;
- **d) Right to restriction of processing [Art. 18 GDPR]:** Applicable in cases of unlawful processing or contestation of data accuracy;
- **e) Right to data portability [Art. 20 GDPR]:** The right to receive data in a structured format to transmit it to another controller;
- **f) Right to object [Art. 21 GDPR]:** The right to object to the processing of personal data;
- **g) Right not to be subject to automated decision-making [Art. 22 GDPR]:** The right not to be subject to a decision based solely on automated processing.

Requests should be addressed to the Data Controller using the form provided by the Data Protection Authority, which can be downloaded from our website <https://www.modulblok.com/it> or from the Authority's website <https://www.garanteprivacy.it>. Requests should be sent via email to pec.modulblok@pec.modulblok.it or by registered mail with return receipt to: **Modulblok S.p.A., Via Vanelis, 6 Pagnacco (UD) 33010.**

Where processing is based on **Art. 6, para. 1, letter a)**, the data subject has the right to **withdraw consent at any time** without affecting the lawfulness of processing based on consent before its withdrawal. In the event of a breach of regulation, the user has the right to **lodge a complaint** with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali).