

Privacy policy – contract management

rendered in accordance with Art. 13, par. 1 of REGULATION EU 2016/679 on the protection of personal data (GDPR)

Within the context of contractual relationships established and as Data Controller, COGES S.p.A. informs the interested parties about the methods and purposes of the processing of personal data of its customers and/or their legal or commercial representatives in accordance with Regulation (EU) 2016/679, General Data Protection Regulation (GDPR).

A. Data Controller – Identity and contact details

COGES S.P.A. (Tax Code and VAT no.: IT00527790240) with registered office in Via G. Leopardi 23, 36030 Caldogno, certified email address: cogesspa@pec.it

B. Data Protection Officer – DPO

It is noted that the Data Controller, along with the Group Companies, has designated a Data Protection Officer, in accordance with Art. 37 of the GDPR, who can be contacted using the following details: Telephone: +34 948709872 – Email: responsableseguridad@Azkoyen.com

C. Categories of Processed Data

In managing orders received and in concluding a contract with the company Coges S.p.A., common personal data are collected relating to natural persons (by way of example but without limitation personal details, contact details, company or organisation of reference).

It is noted that the disclosure of personal data is a legal or contractual obligation or a requirement necessary for the conclusion of the contract.

D. Purpose and Legal Basis of Processing

The personal data provided will be used by the Data Controller and the interested parties for the following purposes:

1. to manage the sale/supply contract, the legal basis of which is the need to process the data in order to perform the contract (Article 6(b) GDPR).
2. to perform internal accounting, tax and administration processes, the legal basis of which is compliance with legal obligations (Article 6(c) GDPR).
3. to respond to information requests, the legal basis of which is the performance of the contract or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) GDPR).
4. To allow COGES S.p.A. to engage in business with its customers, the legal basis of which is the consent of the Data Subject (Article 6(1)(a) GDPR).

E. Methods for the processing of personal data

The personal data collected are processed in compliance with the principles of legality, fairness, and transparency, as per Article 5 of the GDPR, also with the help of computer and telecommunication tools designed to store and manage the data, and, in any case, in a manner that ensures their security and protects the utmost confidentiality of the Data Subject.

F. Categories of persons authorised to process and to whom the data may be disclosed

In addition to the Data Controller, in some cases, the personal data of users may be known and processed, in compliance with current legislation, by other subjects involved:

- Access may be granted to providers of independent services assigned by COGES S.p.A. as Data Processors, such as legal/tax advisers, marketing firms, providers of IT related services such as hosting, IT maintenance, IT security and other similar services.
- The data may be disclosed to other Azkoyen group enterprises to carry out internal administration procedures, which may entail cross-border processing within the European Economic Area (EEA). The personal data acquired for the signature of a specific contract may be transferred to the official distributor of Azkoyen, corresponding to the registered office of the customer, so as to manage the contract in question.

Personal Data is processed at the Data Controller's operating headquarters and in any other place where the parties involved in the processing are located.

This is subject, in any case, to the disclosure of the necessary data, in conformity with the law, by the Public Safety Authority, the Judicial Authority or other public bodies for purposes of defence, State security and criminal assessments, as well as the disclosure to the Judicial Authority in compliance with legal obligations.

Except for the aforementioned cases, personal data shall in no way and for no reason be disclosed or disseminated to third parties. Finally, personal data shall not be transferred to third countries or international organizations unless this is strictly related to specific requests from the user, for which specific consent shall be acquired.

G. Retention period

Personal data shall be retained for the duration of the contractual relationship and, after the same, for the time necessary to fulfil the applicable legal and contractual obligations.

When processing is based on the User's consent, the Data Controller may keep Personal Data longer until such consent is withdrawn.

Moreover, the Controller might be obliged to retain Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, Personal Data shall be deleted. Therefore, at the end of this term, the right of access, deletion, rectification, and the right to data portability cannot be exercised.

H. Exercise of rights

Please be informed that, as a Data Subject, you shall be entitled to exercise the rights foreseen by the GDPR in respect of all personal data processed and, more specifically:

- the right to access collected and processed data (Article 15); the right to obtain rectification of data (Article 16); the right to obtain deletion of data and the right to be forgotten (Article 17); the right to obtain restriction of processing (Article 18); the right to data portability to another controller (Article 20); the right to object to processing (Article 21); the right to withdraw consent (where processing is based on consent), without affecting the lawfulness of processing based on consent before its withdrawal (Article 7); the right to lodge a complaint with a Supervisory Authority (Article 77); the right to a judicial remedy against a Supervisory Authority (Article 78) and against the Controller or the processor (Article 79).

To exercise the mentioned rights, Users may send a request using the contact details of the Controller or the DPO indicated in this document. Requests are filed free of charge and shall be processed by the Controller as soon as possible, in any case within one month.

Changes to this Privacy Policy

The Data Controller reserves the right to make changes to this privacy policy at any time, notifying the data subjects on this page and, if possible, on this Website as well as, and, where technically and legally feasible, sending a notification through one of the contact details in the Controller's possession.

Should the changes affect processing whose legal basis is consent, the Controller shall re-collect the User's consent.

THE DATA CONTROLLER
Coges S.p.A.