



PRIVACY NOTICE

ex art. 13 et seq., EU Reg. 679/2016 (GDPR)

Transparent information

- CONTROLLER’S NAME AND CONTACT DETAILS : dr. Alberto Nicolini (e-mail castagna@castagna-univel.com; PEC castagnaunivel@pec-impres.com; tel. 0377/51801), Legal Representative of Gruppo Univel made up by following firms: Castagna Univel S.p.A. with administrative and operational headquarter in 26862-Guardamiglio LO (I), Via Emilia no. 1, TVA IT00863790333, f.c. 00806330155, Filca Univel S.r.l. with administrative and operational headquarter in 13044-Crescentino VC (I), Via Vercelli no. 63, TVA/f.c. IT01574930333 and Tecnopack Univel S.r.l. with administrative and operational headquarter in 27036-Mortara PV (I), Via R. Sanzio no. 136, VAT no./tax code IT01680430335. All the firms have registered office in 29122-Piacenza PC (I), Via G. Nastrucci no. 23.
- IDENTITY AND CONTACT DETAILS OF THE JOINT CONTROLLER: irrelevant.
- IDENTITY AND CONTACT DETAILS OF CONTROLLER’S REPRESENTATIVE: irrelevant.
- (INTERNAL) PROCESSOR’S IDENTITY AND CONTACT DETAILS: dr. Stefano Belletti (e-mail filca@filca.com; PEC filca.univel@pec.it; tel. 0161/833211), Plant Manager of company Filca Univel S.r.l. with administrative and operational headquarter in 13044-Crescentino (VC), Via Vercelli no. 63, VAT no./tax code IT01574930333 and registered office in 29122-Piacenza PC (I), Via G. Nastrucci no. 23.
- IDENTITY AND CONTACT DETAILS OF DATA PROTECTION OFFICER: irrelevant.
- IDENTITY AND CONTACT DETAILS OF OF THE SYSTEM ADMINISTRATOR: eng. Marco Di Giovanni (e-mail filca@filca.com; PEC filca.univel@pec.it; tel. 0161/833260), CED manager of the company Filca Univel S.r.l. with administrative and operational headquarters in 13044-Crescentino VC (I), Via Vercelli no. 63, VAT no./tax code IT01574930333 and registered office in 29122-Piacenza PC (I), Via G. Nastrucci n. 23.
- THE PURPOSE OF THE PROCESSING: operational, law, trade and administrative management of legal contractual and also pre-contractual (provision of goods or services or work performance) or extracontractual relationship (commitments ad legal requirements) for the exercise of controller’s business (print and converting and sale of flexible packaging for food and non-food), as well as management of not legal relationship (for instance interpersonal relation) pertinent to the exercise of business.
- LEGAL BASIS FOR PROCESSING PERSONAL DATA: contracts’and business fulfillment and even initial business (provision of goods or services or work performance) or performance of obligations and legal commitments for the exercise of the controller’s business (print and converting and sale of flexible packaging for food and non-food).
- LEGITIMATE INTERESTS: contractual legal relationship performance even pre-contractual (provision of goods or services or work performance) or extracontractual (performance of obligations and legal requirements) for the exercise of the controller’s business (print and converting and sale of flexible packaging for food and non-food) as well as management of not legal relationship (for instance interpersonal relation or promotional) pertinent to the exercise of business.
- PROCESSING MODALITIES: manual processing or IT procedures on paper or on digital files.
- NAMED PARTIES OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA: work or services providers or contractors, as well as public authorities (by way of example and not limited to, companies or professionals providing elaborative services or instrumental or consulting activities, trade associations, union entity, credit institutions, insurance companies, certification bodies, monitoring public authorities, or education bodies and workers’oriented medical-diagnostic centers), prior taking on, where foreseen, their commitment to grant protection of rights of data subjects as (external) data protection officers.
- DATA RETENTION PERIOD: data will be retained during the whole contractual obligations and even pre-contractual and work and extra contractual, as well as according to legal deadlines, for no longer than reasonably necessary in relation to each processing purpose, under the terms of the law.
- THE EXISTENCE OF ANY AUTOMATED DECISION-MAKING, EG. PROFILING: no.
- ANY INTENT OF THE CONTROLLER TO TRANSFER PERSONAL DATA TO THIRD COUNTRIES OR TO INTERNATIONAL ORGANISATIONS: no.

- IF PERSONAL DATA DISCLOSURE IS A LEGAL OR A CONTRACTUAL DUTY OR A NECESSARY REQUIREMENT TO FULFILL A CONTRACT AND IF DATA SUBJECT IS OBLIGED TO SUBMIT PERSONAL DATA , AS WELL AS , THE CONSEQUENCES OF FAILING TO PROVIDE DATA (data collection from data subjects): it deals with, on a case-by-case basis, a legal commitment, a contractual obligation or a requirement necessary to fulfill a contract namely to continue a not legal (eg. relational) relationship related to the controller’s activity (print and converting and sale of flexible packaging for food and non-food). Its rejection precludes, from time to time, a successful contract fulfillment (affecting individuals to non-compliance responsibility), a performance of obligations or a legal requirement (affecting individuals to any sanctions) or a not legal (eg. relational) relationship’s prosecution related to the enterprise.
- CATEGORIES OF PERSONAL DATA (data collection from third parties): personal data are collected from data subjects. Anyway it deals with common personal information like registry and digital identity, personal situations, job or organisational, manufacturing, industrial, trade, economic, financial, capital, administrative, tax and accounting contexts, still or moving images collected both by the external perimeter video surveillance system of the plant (to protect company assets, without univocal identification or authentication) and during any promotional filming carried out in the company (consistent with the relevant legal provisions, not harmful of personal dignity, published on the website www.gruppounivel.it), as well as particular personal data (already sensitive), in particular those relating to the state of workers’ health.
- THE SOURCE OF PERSONAL DATA , AND IF IT MIGHT BE THE CASE, POSSIBILITY THAT THE DATA COME FROM PUBLIC AVAILABLE SOURCES (data collection from third parties): personal data are collected from data subjects. If data are collected from third parties sources are always publicly available (by way of example and not limited to, public registers, lists, files storage, or contained in acts or publicly accessible documents or however generally accessible to anyone because coming from categories records, press reports, web sites and internet portals accessible to anyone).

Individuals’ rights

DATA SUBJECTS HAVE THE RIGHT TO ASK THE CONTROLLER:

- the access to personal information (individuals have the right to find out if personal data are being processed, and if so, individuals can find out what processing purposes are, categories of personal processed data, data retention period and to which recipients data can be disclosed to);
- to have inaccuracy corrected (individuals have the right to obtain, without undue delay, the rectification of inaccurate personal information and incomplete data to be completed);
- to have information erased, that is “the right to be forgotten” (individuals have the right to obtain, without undue delay, personal data to be erased, in certain circumstances);
- restriction of processing (individuals have the right to obtain the processing of information restricted, in certain circumstances);
- to object to processing (individuals have the right to object to the processing of personal data, unless it is in legitimate interests of the controller);
- data portability (individuals have the right to get personal data in a way that is accessible and machine-readable and have the right to ask that given information are transferred from one organisation to another in certain circumstances);
- withdrawal of consent (if processing data on condition of consent) in any moment without precluding lawfulness of processing based on consent given before withdrawal;
- should the controller further process personal data for a different purpose than the purpose they were collected for, before further processing , information regarding such different purposes and any other pertinent information;
- you have the right of not being submitted to an automated decision-making process, profiling included (not being submitted to a decision based solely on the automated processing , profiling included, producing legal effects or affecting individual similarly).

Data subjects have the right to process a complaint to a supervisory authority (Autorità Garante per la Protezione dei Dati Personali, Piazza di Montecitorio n. 121, 00186 - Roma).

This information pursuant to art. 13 et seq., GDPR is available in the “Privacy” section of the website www.gruppounivel.com.