



INFORMATION NOTICE REGARDING THE PROCESSING OF CLIENTS' PERSONAL DATA PURSUANT TO ART. 13 AND 14 OF EU REGULATION 2016/679 ("GDPR")

1. Data controller and contact details:

Data Controller is NOVACCIAI S.r.l., established in San Pietro Mosezzo, Via Verdi, n. 26, telephone number. 0321530611, e - mail: info@novacciaimartin.it.

2. Data Protection Officer (DPO)

The Data Protection Officer (DPO) of NOVACCIAI MARTIN S.p.A is reachable by e-mail at the following address: dpo@orimartin.it.

3. Personal Data Object

3.1 Personal Data

A data subject is a natural person. Examples of a data subject can be any information relating to an identified / identifiable and can be anything from a name and surname, date/place of birth, fiscal code, address, email address, education details, work experience, knowledge of languages, number of family members, income and asset details, bank details.

3.2 Sensitive Personal Data

If you have provided in your Curriculum Vitae sensitive personal data as "special categories of personal data" including religious or philosophical views, political opinions, trade union membership, health (belonging to sheltered workshops), sexual orientation, racial or ethnic origin, this data will be immediately erased without consent given to personal data being processed.

3.3 Data source

The term "Data" includes data on natural persons processed by the company to agree and execute contractual relationships with company clients, such as data relating to legal representatives signing contracts on behalf of clients, in addition to client employees/consultants involved in the disclosure of contracts and/or contact activities.

4. Data processing purposes and legal basis

4.1 The processing of the personal data is driven by the following purposes:

- Purposes relating to establishing and executing the contractual relationship between the Supplier and the Company;
- To fulfill administration/accounting requirements, such as accounts and treasury management, invoicing (e.g. logging and checking invoices) in accordance with legislation;
- Extrajudicial debt recovery;
- If necessary to ascertain, exercise and/or safeguard Company rights in legal proceedings

4.2 The processing of the personal data is entitled by the following legal basis:

- Execution of the contract with regard to data on the client legal representatives. Legitimate interest with regard to data on the client employees/consultants involved in contract activities, for processing a), d);
- Requirement to meet the Company's legal obligations, for processing b);
- Legitimate interest.



4.3 Data Retention Period

Personal Data object of this information notice will be preserved for duration of the contract and after completion, for proceedings.

In case of legal disputes data will be preserved for the duration of the legal dispute until completion of the terms of implementation outlined in legal remedies.

Once the above storage terms have elapsed, data will be destroyed or made anonymous, compatibly with the technical erasure procedures and backup.

5. Data Recipients

Data may be communicated to parties operating as data controllers, such as Public Organisations, Authorities, Istitutions and certifying bodies;

Data may be processed on behalf of the data controller by external parties appointed as data processors carrying out specific activities for the controller, such as dealing with accounting, tax and insurance requirements, sending correspondence, managing takings and payments; carriers; security services and other companies working for the controller as advisors.

6. Parties authorised to process Data

Data may be processed by employees in company departments who are responsible for carrying out the activities outlined above and have been authorised to process the Data and have received suitable operating instructions.

7. Provision of data

The provision of data is compulsory for closing and execution of the agreement. If you don't provide your personal data, you aren't able to establish an agreement and to keep up with related obligations.

8. Data Subject's rights – Complaint to the supervisory body

By contacting the office department via e-mail sent to privacy@orimartin.it, data subjects can ask the Company for access to personal data, or the correction or deletion of personal data, and also have the right to restrict processing of the data in the cases set out in article 18 of the GDPR, and object to processing in the case of legitimate interests of the controller.

Furthermore, in the case where processing is based on consent or a contract and carried out with automated tools, data subjects have the right to receive the personal data in a structured, commonly used and machine-readable format, and to transmit the data to another data controller without obstruction.

Data subjects have the right to lodge a complaint to the competent Supervisory Authority in the member state where they are resident or work, or the member state where the alleged breach took place.

Data subjects have the right to withdraw consent at any time in relation to Data processed for marketing purposes, and object to data being processed for these purposes. Data subjects have the possibility of stating a preference for being contacted for the aforementioned purposes through conventional methods and objecting to receiving communication through automatic methods only.

Last updated on: 25/07/2025

NOVACCIAI MARTIN S.r.l.
Rappresentante Legale