



SPONTANEOUS TRANSMISSION OF INFORMATION PRIVACY POLICY

ex Article 13 EU Regulation No. 2016/679

Data collected directly from the data subject

The following privacy policy is provided pursuant to Article 13 of the European Regulation No. 2016/679 and is intended to provide the following information necessary to ensure a correct and transparent processing of your personal data.

The Controller

The Controller is Sterling S.p.A., C.F. and VAT number 03049420544, with its registered office at Via della Carboneria, n. 30 – 06073 – Corciano (PG) – Italy (hereinafter, the “**Company**”) – e-mail: privacy@sterling.it.

Processing purpose and legal basis

The processing of personal data that are spontaneously transmitted by the data subject is aimed solely at:

Processing personal data purpose	Legal Basis
Taking charge and properly handling your request	Performance of the contract or of pre-contractual measures.

Recipients or other possible categories of recipients of personal data

Your personal data may be communicated, only for the above-mentioned purposes, to the following categories of recipients:

- Postal service companies, carriers, logistic operators.
- Information Technology consulting companies
- Group companies

Data retention period

The data provided in compliance with the above-mentioned purposes will be kept for:

Processing purpose	Retention Criteria
Taking charge and properly handling your request	The period needed to handle your request

How and where we process your personal data

Your personal data will be processed within the European Union through IT/manuals tools for which we have applied appropriate security measures and with the support of our staff who has been duly authorized and trained for this specific purpose. However, it is understood that the Controller, if necessary, shall have the right to move servers even outside the European Union. In such a case, the Controller hereby ensures that the transfer of personal data outside the European Union shall take place in compliance with the applicable legal provisions, for example through the adoption of standard contractual clauses provided by the European Commission that ensure an adequate level of protection of personal data even outside the European Union.

Rights of the data subject

As a data subject, you have the right to: (i) request access to your personal data; (ii) ask for the rectification, limitation of deletion of your personal data; (iii) oppose to the processing of your personal data and (iv) request the portability of your personal data, if necessary. To facilitate the exercise of your rights, the Company has created a special e-mail address privacy@sterling.it or, alternatively, you can use any other mean of contact of our Company (telephone, fax, etc.) Before we can provide or modify any information, you might be asked to verify your identity and answer some questions. An answer will be provided as soon as possible.

Right to complain

If you still consider that your rights have been violated, you can lodge a complaint before the Privacy Authority through the appropriate form published on the website www.garanteprivacy.it

Mandatory disclosure of data and consequences of refusal

Processing purpose	Mandatory	Consequences of refusal
Taking charge and properly handling your request	YES	Impossibility to handle your request for information.

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Soggetta ad attività di direzione e coordinamento
di S.N.I.F.F. ITALIA S.p.a.