

**Advisory note as per art.13 of Regulation (EU) 2016/679 on the protection of personal data (GDPR)
FOR PROCESSING CUSTOMER DATA**

ICSEA HELEN SEWARD sas, pursuant to article 13 of European Regulation no. 2016/679, regarding protecting natural persons in terms of processing their personal data (hereafter the “**GDPR**”), which came into effect on 24 May 2016 and has been applicable since 25 May 2018, hereby provides some information regarding the processing of your personal data, collected in order to execute the pre-contractual and/or contractual obligations, and to fulfil any legal obligations. In the event that this document is modified or adapted, it is the Controller’s responsibility to advise you by email, telephone or traditional post/mail service. The latest version of this document is always available at the following link: www.helenseward.it

1. Purposes for processing personal data and the legal basis for the processing

Personal data requested is collected and processed for the following purposes:

1.1. To execute pre-contractual/contractual measures and legal obligations

- 1.1.1. Your personal data is collected in order to fulfil the obligations connected with the company’s economic activity, to fulfil pre-contractual and/or contractual requirements, and to fulfil any legal obligations.
- 1.1.2. Supplying this data involves entering it into our databases for the economic/contractual activity.
- 1.1.3. The data will be appropriate, relevant and limited to that necessary, accurate, if necessary, updated with regard to the purposes for which the data was collected.
- 1.1.4. In addition, the Controller may process your data to send you communications about the service by email or by direct telephone contact or by traditional post/mail if you freely decide to supply this data when signing the contract. You may choose, at any time, to no longer receive these communications about the service sent by telephone, email or traditional post/mail in accordance with the methods indicated under point 7 of this advisory note.
- 1.1.5. The legal basis for processing personal data referred to in points 1.1.1, 1.1.2, 1.1.3 and 1.1.4 is the execution of a contract to which the interested party is a party pursuant to article 6(1)(b) and (c) of the GDPR.

1.2. Marketing purposes

- 1.2.1. Your personal data (the data collected for the purposes referred to in point 1.1, above, as well as the additional contact information that you may freely decide to provide when registering) will be processed for marketing purposes, that is, to send informational and promotional material, even of a commercial nature, advertising material and/or offers of products and services promoted by the Controller and to carry out market surveys and research through automated means of contact (electronic mail, SMS text message) by the Controller.
- 1.2.2. The legal basis for processing personal data referred to in point 1.2.1. is the consent granted pursuant to article 6(1)(a) of the GDPR.

2. Providing data and the consequences of refusing to do so

- 2.1. With regards to processing personal data for the purposes indicated in paragraph 1.1, providing data is mandatory to fulfil the obligations connected with the company’s economic activity, to fulfil pre-contractual and/or contractual requirements, and to fulfil any legal obligations. If you refuse to provide your personal data, it will render it impossible to fulfil the legal and contractual obligations.
- 2.2. With regards to processing personal data for the marketing purposes indicated in paragraph 1.2, providing personal data is optional and processing it is subject to you granting consent. If you refuse to provide data or to grant your consent, this does not constitute a valid prerequisite for processing your personal data referred to in point 1.1.

3. Methods of processing

- 3.1. Processing personal data is based on the principles of correctness, lawfulness and transparency. Processing personal data may also be done using automated means aimed at storing, managing and sending data and will be done using suitable technical and organisational measures to guarantee, amongst other aspects, the security, confidentiality, integrity, availability and robustness of the systems and services, through the use of appropriate procedures designed to prevent the risk of losing data, unauthorised access to data, illicit use and distribution of data.
- 3.2. The data will reside on a platform managed by the Controller and by service providers appointed by the same, on services situated within the European Union.

4. Recipients of personal data

- 4.1. Your personal data will be processed by the Controller’s employees and collaborators, in their capacity as parties authorised to process personal data.
- 4.2. Your personal data will be processed by companies entrusted by the Controller who perform certain services on behalf of the Controller. These companies are, specifically:
 - credit institutes, financial intermediaries, credit protection companies, to manage our economic relationships;

- to third-party companies who process data on behalf of the Controller and which are authorised to provide consultancy or services;
- companies that deal with postage/mailing services regarding advertising material or promotional communications;
- companies that carry out market analysis and research.

These companies are direct partners of **ICSEA HELEN SEWARD sas** and carry out the role of Processor.

The list of Processors is kept constantly up to date and is available, upon request, by writing to the address indicated below or by emailing: ammmministrazione@helenseward.it

4.3. Your personal data will not be transferred to autonomous third parties, nor will it be distributed.

5. Storage period for your personal data

- 5.1. Personal data processed for the purposes of registration referred to in paragraph 1.1 will be stored for the duration of the contractual relationship and for 10 years from its conclusion or until you exercise your rights referred to in point 6.
- 5.2. Personal data processed for the marketing purposes referred to in paragraph 1.2 will be stored until you revoke your consent to this data being processed for the aforementioned purposes.
- 5.3. After this period, the data will be deleted and/or made anonymous in such a way as to prevent, even indirectly or by connecting to other databases, the interested party from being identified.

6. Your rights

- 6.1. With regards to processing personal data carried out by the Controller, you have the opportunity to exercise your rights pursuant to articles 15 to 20 of the GDPR and, specifically, of asking the Controller for access to your personal data and/or to rectify and/or to delete your personal data, and/or to object to your personal data being processed and/or to restrict processing of your personal data. Without prejudice to any other administrative or judicial recourse, you may personally lodge a complaint with the supervisory authority for the protection of personal data.
- 6.2. Pursuant to article 20 of the GDPR, you may exercise, in addition to the rights indicated above, the right to have your data made portable. In this case, you have the right to ask the Controller to make the personal data that concerns you available in a structured, widely-used format that can be read by an electronic device and, subsequently, the right to send this data to another Controller without obstruction or hindrance from the principal Controller.
- 6.3. These rights may be exercised by sending a written communication to the address indicated below or by emailing: amministrazione@helenseward.it and, in the case of data portability, you may ask that your personal data is sent directly by the Controller to another Controller, when technically feasible and correctly identified.

7. Revoking consent

- 7.1. You may revoke your consent to the processing of your personal data for marketing purposes at any time by sending an email to: amministrazione@helenseward.it
- 7.2. Revoking consent does not prejudice the lawfulness of any processing performed and based on the consent given previously to the moment consent was revoked.

8. Contact details for the Controller and the Processor(s)

- 8.1. The Controller is **ICSEA HELEN SEWARD sas** with registered offices in Via A. De Gasperi no. 8A - 20020 Lainate (MI), Italy who may be contacted: by post/mail at Via A. De Gasperi no. 8A - 20020 Lainate (MI), Italy and by email at: amministrazione@helenseward.it.

The Controller
Icsea Helen Seward sas