

## PRIVACY POLICY FOR THE WEBSITE WWW.WELTELECTRONIC.IT

### The Data Controller of non-European Countries for the sole purposes specified in the information sheet

Welt Electronic S.p.A.  
Via della Treccia, 33 P.I. 03714360488  
MAIL [info@weltelectronic.it](mailto:info@weltelectronic.it) - PEC [weltelectronic@pec.it](mailto:weltelectronic@pec.it)

Contents	Detail
<b>2. Contact details of the DPO</b>	
No DPO was appointed as of the date of the preparation of this information sheet.	To date, the Data Controller, after conducting the appropriate assessments, did not take care to identify a Data Protection Officer (briefly "DPO") pursuant to Art. 37, and ff., of GDPR no. 679/2016, reserving the option to supplement this information sheet should a different decision be made at a later time.

Contents	Detail
<b>3. Data Processors</b>	
These are persons differing from Data Controllers, who can handle Your personal data in our name and on our behalf. A list is available at our headquarters and can be requested using the contact details provided above.	The list of data processors that may have been appointed and of system administrator(s) is available at our headquarters. Employees or partners of the third parties who cooperate with the Data Controller may be authorized to process data in certain cases, if the processing operations take place under the direct control of the Data Controller.

Contents	Detail
<b>4. Legal basis of the processing / Why we process Your data</b>	
Basic purposes (consent required) To provide updates and information on Welt's activities. Ancillary purposes: marketing	Data are processed, as part of our routine activities, for the following purposes: a) purposes related and instrumental to information requests; b) purposes related and instrumental to the fulfilment of legal obligations, as required by laws, regulations and EU legislation for taxation, accounting, social security and support; c) exercise of rights, including by third parties, in judicial, arbitration and administrative proceedings, in compliance with regulatory limitations. Ancillary purposes are defined as activities aimed at planning and executing, by using computerized and non-computerized means (i.e., traditional methods such as paper mail or operator calls), analytical, strategic and operational marketing activities, including through the use of CRM (Customer Relations Management) systems .

Contents	Detail
<b>5. Which data we process and how</b>	
We process personal details, fixed/mobile phone numbers, e-mail addresses, tax data, economic data, and so on ...	Including but not limited to: • Personal details (first name, last name, e-mail address, mobile/phone number, country) • Company data (company name, VAT number, country, region)

Contents	Detail
<b>6. Processing methods</b>	
Paper and electronic processing	Your personal data are processed using manual and automated instruments, with methods that are strictly related to the above-mentioned purposes, and in any case in such a way as to ensure the security and confidentiality of Your data. We do not profile data for any purpose. If you would like to obtain further information, we remind you Your Data Subject rights, as specified herein.

#### sede operativa

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Via della Treccia, 33 - 50145 Firenze, Italy  
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#### dati societari

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Contents	Detail
<b>7. When are You required to provide Your personal details?</b>	
Basic purpose: legal obligation Ancillary purposes: authority	With regard to the data we are required to obtain (i.e., personal details), in order to fulfil Your requests, or as required by laws, regulations and EU legislation, or by orders imposed by legal authorities and supervisory/control bodies, Your refusal to provide us with Your personal details may prevent us from establishing or continuing our relationship with You to the extent that said data are required for the provision of our services.

Contents	Detail
<b>8. Protection of minors</b>	
	Personal data can be collected only from persons aged 18 years or older. Otherwise, only a person exercising parental authority can provide the personal data of a child.

Contents	Detail
<b>9. Categories of recipients to whom personal data may be disclosed</b>	
<ul style="list-style-type: none"> <li>- Employees and collaborators of the Data Controller, as persons authorized to processing data (administrative, commercial, marketing personnel, system administrators, etc.), duly trained and monitored by the Data Controller;</li> <li>- Third parties (e.g., providers of technical services, hosting providers, IT service companies, business partners, where necessary to fulfil specific obligations, etc. ).</li> </ul>	<p>We will not disclose Your data - meaning that we will not transfer them to any unidentified person, including by making them available for consultation.</p> <p>In general, we may disclose Your data to identified persons, as follows:</p> <ul style="list-style-type: none"> <li>• to persons who may access said data under legal provisions, regulations or EU legislation within the limits laid down by those rules;</li> <li>• to persons who need access Your data for ancillary purposes, within the relationship between You and Us, to the extent strictly necessary to carry out the related tasks;</li> <li>• to employees, collaborators or the like, operating under the authority of and as instructed by the Data Controller in compliance with the applicable regulatory requirements;</li> <li>• to the Data Protection Officer (if appointed);</li> <li>• to persons who, under contract provisions and for preliminary purposes in the management of the activities agreed with You and/or ancillary services and/or Your specific requests, need to collect Your personal information;</li> <li>• to managers of the institutional website who carry out technical or organizational tasks on our behalf;</li> <li>• to system administrators specially appointed by Us in compliance with the applicable regulatory requirements;</li> <li>• to third parties providers of technical/IT services, including with servers not located in the European Union, after checking that the necessary requirements are met (a list of these parties and the related documentation are available at the Data Controller's headquarters upon request from the Data Subject, which request must be submitted by using the applicable methods for the exercise of their rights), which may be used by the Data Controller for the fulfilment of specific obligations, and in any case for the organization and conduction of all the activities related to the fulfilment of the task, including any ancillary services as specified herein.</li> </ul> <p>The Data Controller manages and updates a list of recipients/external processors/system administrators, which may be requested by the Data Subject using the same methods used for the exercise of their rights.</p> <p>NOTE: There is no automated decision-making process (profiling), except for the need to identify competencies within the framework of the organization of events.</p>

Contents	Detail
<b>10. Personal data retention period</b>	
<ul style="list-style-type: none"> <li>- 10 years (basic purposes) - Statutory retention period</li> <li>- 24 months (other purposes)</li> </ul>	Beyond the (mandatory) 10-year period required for the retention of contract, accounting information, etc., Your personal data will be kept in our records for the period considered appropriate or for a maximum of 24 months - we specify that, with regard to marketing purposes, unless You have expressly requested otherwise, Your personal information will be deleted before the end of the term only in the event of termination of our contractual or cooperation relationship for any reason.

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	Said term may be reduced and/or increased (after so notifying the Data Subjects) in the case of, for example, prescriptions from supervisory institutions or authorities. You may always revoke Your consent at any time without prejudice to the lawfulness of the processing based on the consent given before the revocation.
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Contents	Detail
<b>11. Transfer to non-EU countries</b>	
The Data Controller may transfer Your personal information to non-EU countries, e.g., in order to use archiving services or mailing lists, in which case, the Data Controller shall obviously undertake to arrange for the necessary protection.	The transfer of personal data to Countries outside the European Union may pose greater risks and, as such, must be adequately supervised. Should the Data Controller avail itself of this option, the Data Controller agrees to collect in advance and make available to the Data Subjects all the supporting documentation by using the same methods for the exercise of their rights.

Contents	Detail
<b>12. Lodging a complaint with the Data Protection Authority</b>	
	The procedures available for the Data Subject to protect their personal information (and exercise their rights) are specified below: Accessing the website <a href="http://www.garanteprivacy.it">www.garanteprivacy.it</a> and the specific section dedicated to complaints in the event that the competent body is the Italian authority; or According to the procedures laid down by the Supervisory Authority of the Member State (where other than Italy) in which the Data Subject has his/her permanent residence, works or where the alleged infringement has occurred.

Contents	Detail
<b>13. Your rights</b>	
Access – Limitation – Rectification – Opposition – – Withdrawal of consent – Cancellation (oblivion) – Portability	Right of access: You may receive copies of the personal data being processed at any time. Right of limitation: this right may be exercised not only in the event of a breach of the legal basis of the processing, but also in the event of a request to correct the data or if the Data Subject opposes the processing. The Data Controller agrees to mark the data in question during the period of its assessment of the situation to make a decision by using suitable organizational measures for this purpose. Right of rectification: You may correct or rectify Your incorrect personal data without delay and may also supplement incomplete personal data, also by submitting a supplementary statement. Right of opposition: You may object at any time, for reasons related to Your specific situation, to the processing of Your personal data, even if used for direct marketing and/or profiling (where applicable). Right to withdraw consent, where given, e.g. for marketing and similar purposes. Right of cancellation (oblivion): Data Subjects can request the cancellation of their personal information in a reinforced form, e.g., after withdrawing their consent to the processing of their personal data. Right to portability: this right does not apply to non-automated processing, i.e., paper archives/registers. In addition, only the data that are provided by the Data Subject to the Data Controller and processed with the consent of the latter or based on a contract executed with the Data Controller are portable.

Contents	Detail
<b>14. What contacts can be used to exercise Your rights?</b>	
	Welt Electronic S.p.A., based in Florence (Italy), Via della Treccia, 33 - VAT number: 03714360488 Email: <a href="mailto:info@weltelectronic.it">info@weltelectronic.it</a> - Certified email: <a href="mailto:weltelectronic@pec.it">weltelectronic@pec.it</a>

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<p><b>15. Term and method of response from the Data Controller to those Data Subjects who wish to exercise a right concerning their personal data</b></p>	
<p>1 (one) month, which can be extended up to 3 (three) months for more complex cases, in writing.</p>	<p>We point out that, in the event that You should exercise Your rights, the Data Controller is required to provide a written response, including through electronic means that favour accessibility (orally only upon the express request of the Data Subject) within a term of 1 (one) month, which can be extended to 3 (three) months in particularly complex cases, without prejudice to the obligation to provide a response within one month of the request even in the event of a denial.</p> <p>The Data Controller, after assessing the complexity of the Data Subject's request, may establish the amount of a possible fee that will be charged to the Data Subject in case of clearly ungrounded or excessive requests.</p>

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