



Registered office: via Bitritto 119 – Bari, 70124 Italy
VAT number: 05194870720 – Tax code: 05194870720
Tel.: +39 080 532 66 06 / +39 080 532 65 57
Fax: +39 080 536 85 41
E-mail: info@cmclift.com – certified mail: cmclift@pec.it







INFORMATION FOR NEWSLETTER SUBSCRIBERS - Art.13 EU REGULATION 2016/679

Information for newsletter subscribers

Dear Madam/Sir

C.M.C. S.r.l., the data controller, informs you about the processing of your personal data.

Information regarding the processing of personal data of newsletter subscribers

PURPOSE OF THE PROCESSING	<p>Your personal data is processed for the following purposes:</p> <ul style="list-style-type: none"> periodic sending of newsletters sending invitations to institutional events exchange of work-related information
DATA PROCESSED	<ul style="list-style-type: none"> Identification data (name) data relating to interaction with the communication (date and time of viewing messages, date and time of downloading any attachments, clicks on any links by the data subject, IP address, geographical location, etc.) contact details (e-mail address)
LEGAL BASIS FOR PROCESSING	<p><input checked="" type="checkbox"/> The data subject has given consent pursuant to Article 6(1)(a) of the GDPR</p> <p><input type="checkbox"/> Processing is necessary for the performance of a contract pursuant to Article 6(1)(b) of the GDPR</p> <p><input type="checkbox"/> Processing is necessary for compliance with a legal obligation pursuant to Article 6(1)(c) of the GDPR</p> <p><input type="checkbox"/> Processing is necessary to protect the vital interests of the data subject pursuant to Article 6(1)(d) of the GDPR</p> <p><input type="checkbox"/> Processing is necessary for the performance of a task carried out in the public interest pursuant to Article 6(1)(e) of the GDPR</p> <p><input checked="" type="checkbox"/> Processing is necessary for the purposes of the legitimate interests pursued by the controller pursuant to Article 6(1)(f) of the GDPR</p>
LEGITIMATE INTEREST	<p>The processing is not necessary. Any refusal to provide your e-mail address or</p>



Registered office: via Bitritto 119 – Bari, 70124 Italy
VAT number: 05194870720 – Tax code: 05194870720
Tel.: +39 080 532 66 06 / +39 080 532 65 57
Fax: +39 080 536 85 41
E-mail: info@cmclift.com – certified mail: cmclift@pec.it

INFORMATION FOR NEWSLETTER SUBSCRIBERS - Art.13 EU REGULATION 2016/679

	to give your consent to the processing will make it impossible to continue using the newsletter subscription service.
RECIPIENTS OF PERSONAL DATA	<p>The recipients of your data are: marketing consultants, IT consultants and legal consultants.</p> <p>The data may be disclosed to public bodies or judicial authorities, where required by law or to prevent or suppress the commission of a crime.</p>
TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS	The data you provide will only be processed in Italy or within the European Union. If, during the contractual relationship, your data is transferred to a country outside the European Economic Area or to an international organisation, the transfer will be carried out with all the technical and organisational measures required by current Italian and European legislation to ensure the security and confidentiality of your data. Furthermore, you will be guaranteed the rights attributed to you by the aforementioned legislation and you will be promptly notified of the transfer.
DATA RETENTION PERIOD	Your personal data will be stored until you withdraw your consent, or for a period not exceeding 24 months from the registration of the data or until the termination of the contractual relationship.
RIGHTS OF DATA SUBJECTS	<p>As a data subject, you have the following rights with regard to the confidentiality and protection of your personal data:</p> <ul style="list-style-type: none"> access to your data rectification erasure restriction of processing objection to processing portability of personal data complaint to the supervisory authority
HOW TO EXERCISE YOUR RIGHTS	To exercise your rights or to withdraw your consent to receiving the newsletter, you can contact the data controller at the following e-mail address: info@cmclift.com .
RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY	Without prejudice to any other administrative or judicial remedy, as a data subject, you have the right to lodge a complaint with the supervisory authority of the Member State in which you habitually reside, work or where the alleged infringement of European Regulation 2016/679 occurred.






Registered office: via Bitritto 119 – Bari, 70124 Italy
VAT number: 05194870720 – Tax code: 05194870720
Tel.: +39 080 532 66 06 / +39 080 532 65 57
Fax: +39 080 536 85 41
E-mail: info@cmclift.com – certified mail: cmclift@pec.it

INFORMATION FOR NEWSLETTER SUBSCRIBERS - Art.13 EU REGULATION 2016/679

In Italy complaints can be submitted by filling in the appropriate form on the website of the Italian Data Protection Authority: www.garanteprivacy.it

In addition, the Italian Data Protection Authority can be contacted at the following contact details:



-  telephone switchboard: +39 06.696771
-  e-mail address: protocollo@gpdp.it
-  certified e-mail address: protocollo@pec.gpdp.it

SOURCE FROM WHICH THE DATA ORIGINATES

Your data is not collected from any source but is only provided by you to the data controller.

DATA PROCESSING METHODS

Your data will be processed using both computerised and manual devices, in compliance with all technical and organisational measures implemented by the data controller and/or any data processors appointed, to ensure the security and confidentiality of the aforementioned data. Your data will only be processed by:

-  designated persons in charge of processing pursuant to Article 29 of the GDPR and Article 2 - quaterdecies of Italian Legislative Decree 196/2003, as adapted to EU Regulation 2016/679 by Legislative Decree 101/2018, and subsequent amendments and additions.
-  Data processors pursuant to Article 28 of the GDPR

The data controller does not process your data through automated decision-making processes and does not carry out any profiling.

Your rights are those provided for in Articles 7, 15, 16, 17, 18, 19, 20, 21, and 77 of EU Regulation 2016/679.

We remain at your complete disposal for any further information.

Rights of data subjects

Article

European Regulation 2016/679

ART. 7 - CONDITIONS FOR CONSENT

1. Where processing is based on consent, the controller shall be able to demonstrate that the data subject has consented to



Registered office: via Bitritto 119 – Bari, 70124 Italy
VAT number: 05194870720 – Tax code: 05194870720
Tel.: +39 080 532 66 06 / +39 080 532 65 57
Fax: +39 080 536 85 41
E-mail: info@cmclift.com – certified mail: cmclift@pec.it

INFORMATION FOR NEWSLETTER SUBSCRIBERS - Art.13 EU REGULATION 2016/679

processing of his or her personal data.

2. If the data subject's consent is given in the context of a written declaration which also concerns other matters, the request for consent shall be presented in a manner which is clearly distinguishable from the other matters, in an intelligible and easily accessible form, using clear and plain language. Any part of such a declaration which constitutes an infringement of this Regulation shall not be binding.

3. The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.

4. When assessing whether consent is freely given, utmost account shall be taken of whether, inter alia, the performance of a contract, including the provision of a service, is conditional on consent to the processing of personal data that is not necessary for the performance of that contract.

ART. 15 - RIGHT OF ACCESS BY THE DATA SUBJECT

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- (a) the purposes of the processing;
- (b) the categories of personal data concerned;
- (c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;

INFORMATION FOR NEWSLETTER SUBSCRIBERS - Art.13 EU REGULATION 2016/679

	<p>(f) the right to lodge a complaint with a supervisory authority;</p> <p>(g) where the personal data are not collected from the data subject, any available information as to their source;</p> <p>(h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.</p> <p>2. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.</p> <p>3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.</p> <p>4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.</p>
ART. 16 - RIGHT TO RECTIFICATION	<p>The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.</p>
ART. 17 - RIGHT TO ERASURE	<p>1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:</p> <p>(a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;</p>



Registered office: via Bitritto 119 – Bari, 70124 Italy
VAT number: 05194870720 – Tax code: 05194870720
Tel.: +39 080 532 66 06 / +39 080 532 65 57
Fax: +39 080 536 85 41
E-mail: info@cmclift.com – certified mail: cmclift@pec.it

INFORMATION FOR NEWSLETTER SUBSCRIBERS - Art.13 EU REGULATION 2016/679

- (b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing;
- (c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);
- (d) the personal data have been unlawfully processed;
- (e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- (f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1).
2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.
3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary:
- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);
- (d) for archiving purposes in the public interest, scientific or



Registered office: via Bitritto 119 – Bari, 70124 Italy
VAT number: 05194870720 – Tax code: 05194870720
Tel.: +39 080 532 66 06 / +39 080 532 65 57
Fax: +39 080 536 85 41
E-mail: info@cmclift.com – certified mail: cmclift@pec.it

INFORMATION FOR NEWSLETTER SUBSCRIBERS - Art.13 EU REGULATION 2016/679

	historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or (e) for the establishment, exercise or defence of legal claims.
ART. 18 - RIGHT TO RESTRICTION OF PROCESSING	<p>1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:</p> <p>(a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;</p> <p>(b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;</p> <p>(c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;</p> <p>(d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject.</p> <p>2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State</p> <p>3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.</p>
ART. 19 - NOTIFICATION OBLIGATION REGARDING RECTIFICATION OR ERASURE OF PERSONAL DATA OR RESTRICTION OF PROCESSING	The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17(1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The



Registered office: via Bitritto 119 – Bari, 70124 Italy
VAT number: 05194870720 – Tax code: 05194870720
Tel.: +39 080 532 66 06 / +39 080 532 65 57
Fax: +39 080 536 85 41
E-mail: info@cmclift.com – certified mail: cmclift@pec.it

INFORMATION FOR NEWSLETTER SUBSCRIBERS - Art.13 EU REGULATION 2016/679

	controller shall inform the data subject about those recipients if the data subject requests it.
ART. 20 - RIGHT TO DATA PORTABILITY	<p>1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where:</p> <p>(a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and</p> <p>(b) the processing is carried out by automated means.</p> <p>2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.</p> <p>3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</p> <p>4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.</p>
ART. 21 - RIGHT TO OBJECT	<p>1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.</p> <p>2. Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any</p>



Registered office: via Bitritto 119 – Bari, 70124 Italy
VAT number: 05194870720 – Tax code: 05194870720
Tel.: +39 080 532 66 06 / +39 080 532 65 57
Fax: +39 080 536 85 41
E-mail: info@cmclift.com – certified mail: cmclift@pec.it

INFORMATION FOR NEWSLETTER SUBSCRIBERS - Art.13 EU REGULATION 2016/679

time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications.

6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

ART. 77 - RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

1. Without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes this Regulation.

2. The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Article 78.



Registered office: via Bitritto 119 – Bari, 70124 Italy
VAT number: 05194870720 – Tax code: 05194870720
Tel.: +39 080 532 66 06 / +39 080 532 65 57
Fax: +39 080 536 85 41
E-mail: info@cmclift.com – certified mail: cmclift@pec.it

INFORMATION FOR NEWSLETTER SUBSCRIBERS - Art.13 EU REGULATION 2016/679

Data controller

C.M.C. S.r.l.

Registered office

via Bitritto 119 – Bari, 70124 Italy

Telephone contacts

+39 080 532 66 06
+39 080 532 65 57

e-mail address

info@cmclift.com

certified mail address

cmclift@pec.it

DPO

Prof. Avv. Francesco Amendolito
e-mail address: famendolito@amendolitoassociati.it
certified mail address:
famendolito@pec.amendolitoassociati.it
telephone contact: 080 501 4547
address: via Marco Partipilo 48 – Bari, 70124 Italy - Studio
Legale Amendolito & Associati