



## INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF THE EU REGULATION 679/2016

The Data Controller informs you about the processing of personal data necessary for the management of the contractual relationship. Personal data mainly relates to individual contacts. The clients receiving invoices are exclusively legal entities.

The information also refers to customers who purchase through the e-commerce functionality of the website [www.luminalpark.com](http://www.luminalpark.com).

**Data Subjects:** Customers and contact persons of customer companies.

**Data Controller:** LUMINAL PARK S.R.L. located in Verona (VR) in Via Goffredo Mameli 11, partita IVA 04199420235, contact email: [privacy@luminalpark.com](mailto:privacy@luminalpark.com)

**Data protection officer:** pursuant to art. 37 of the GDPR, the Data Controller has appointed a DPO who can be contacted at the email address: [dpo@pqa.it](mailto:dpo@pqa.it).

**Purpose of treatment:** your data will be processed for the following purposes on the basis of the relevant legal bases

n°	Finalità	Base giuridica
1	Sales agreement management.	Processing is necessary for the performance of a contract to which the data subject is party. Art. 6 par. 1 comma b)
2	Quotation and offers management.	Implementation of pre-contractual measures taken at the request of the data subject Art. 6 par. 1 comma b)
3	Accounting and tax legislation obligations.	Processing is necessary for compliance with a legal obligation to which the controller is subject; Art. 6 par. 1 comma c)
4	Customer care e after sale services and Customer satisfaction detection	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Art. 6 par. 1 comma f)
5	Litigation management and credit recovery activities	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Art. 6 par. 1 comma f)



<b>6</b>	Invio di messaggi per notificare la disponibilità di articoli all'acquisto.	Processing is necessary to take steps at the request of the data subject. Art. 6 par. 1 comma b)
<b>7</b>	Sending communications via newsletters to keep you updated about new products development, promotions, services and/or events organized by us.	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. Art. 6 par. 1 comma f) Art. 130 comma 4 of the d.Lgs. 196/03

Nobody automated decision-making process (profiling) will be applied to your personal data.

**Type of personal data processed:** for the purposes stated above, it is necessary to process:

- Common identification and contact data;
- Data relating to the economic activities of the data subject;
- Data relating to debt solvency and creditworthiness.

#### **Method of treatment**

The personal data collected will be processed with:

- corporate IT systems and paper archives, in compliance with the Security Measures provided for by art. 32 of the GDPR;
- personal data will be processed by persons appointed as data authorized pursuant to art. 29 of the GDPR.

#### **Data recipients**

Personal data will be disclosed to:

- Banks and credit institutions;
- Providers for electronic payment services;
- Companies that provide digital preservation services in accordance with the law;
- Provider for DEM services and sending newsletter;
- Public or Privat bodies whose communication is necessary for legislative obligations;
- Consultants and freelance professionals, including in an associated form;
- Insurance companies that provide trade credit insurance services;
- Logistic companies and post office.

The above subjects have been expressly appointed as Data Processors pursuant to Art. 28 of the GDPR or as independent data controllers.

**Personal data disclosure:** personal data will not be disclosed.

**Transfers of personal data to third countries:** the personal data collected will be processed within European Union or transferred to third countries in compliance with art. 44 of the GDPR.

**Data retention period:** the retention of your personal data is determined according to the following principles:



Purpose	Data Retention
<b>Retention of accounting and tax records</b>	your data will be kept for 10 years, the time of conservation for fiscal accounting records. Art. 2220 Italian Civil Code.
<b>Sending newsletters</b>	your data will be kept on our mailing lists until you request cancellation using the appropriate function in the mail's body, alternatively you must request cancellation by writing an email to <a href="mailto:privacy@luminalpark.com">privacy@luminalpark.com</a>

**Rights of the data subjects:** Pursuant to Articles 15–22 of the GDPR, the data subject may request from the Controller the exercise of the right of access, rectification, erasure (right to be forgotten), restriction of processing, data portability, objection to processing, and withdrawal of consent.

For more information relating to the data subjects' rights, it is possible to consult the website [www.garanteprivacy.it](http://www.garanteprivacy.it)

Pursuant to art. 77 of the GDPR, data subject can submit a notify by contacting Italian Data Protection Authority located in Piazza Venezia, 11 - 00186 Rome mail: [urp@gpdp.it](mailto:urp@gpdp.it)