



**Information on personal data processing – Newsletter**

Dear Sir,

we need to process your personal data for the below mentioned purposes; according to EU Regulation 679/2016 on personal data protection, we provide the following information.

**1. Controller**

The Controller who determines the means and purposes of personal data processing is SMIPACK SPA, with head office in Via C.Ceresa 10 in San Giovanni Bianco.

**2. Purposes and lawfulness of data processing**

The personal data collected during the employment relationship will be processed for the following purposes and legal basis:

PURPOSES <i>(why your personal data are processed)</i>	LAWFULNESS <i>(legal basis for data processing)</i>	CONSEQUENCES IN CASE OF OBJECTION TO DATA PROCESSING <i>(What happens if you object providing personal data and/or you object to data processing)</i>
For a free-of-charge subscription to our newsletter; to inform you about our initiatives, activities, products; to send you magazines or promotional material	Art. 6 (b) (contract to get free-of-charge information)	The consent is not required, but if you object to providing your personal data, it will not be possible to send you our newsletter. You can object to data processing at any time, based on art. 21.

**3. Recipients and categories of data**

Personal data disclosed for the execution of the contract shall be exclusively processed by authorized personnel or by processors appointed for that purpose.

**4. Data transfer abroad**

Your personal data shall not be transferred out of the European Union.

**5. Data storage period and criteria used to determine that period**

Personal data shall be collected and stored for the purposes mentioned here below.

DOCUMENT	STORAGE PERIOD
Subscription to our newsletter	As far as the data subject requests erasure from the mailing

**6. Rights of the data subject**

You are entitled to exercise your rights under this Regulation in respect of and against the Controller.

- Right of access: according to art.15 of EU Regulation you have the right to obtain from the controller confirmation as to whether or not your personal data are being processed, and, where that is the case, access to your data.
- Right to rectification: according to art. 16 of EU Regulation you have the right to obtain from the controller without undue delay the rectification of inaccurate personal data. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, also by providing a supplementary statement.

- **Right to erasure:** according to art. 17 of EU Regulation you have the right to obtain from the controller the erasure of your personal data without undue delay where one of the provisions of the regulation applies.
- **Right to restriction of processing:** according to art. 18 of EU Regulation, you have the right to obtain from the controller restriction of processing where one of the provisions of the Regulation applies.
- **Right to object:** according to art. 21 of EU Regulation, you have the right to object to processing of your personal data at any time on grounds relating to your particular situation, based on art. 6 (1) point (e) or (f), including profiling based on those provisions.
- **Right to data portability:** according to art. 20 of EU Regulation, you have the right to receive your personal data, which you 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.
- **Right to withdraw your consent:** according to art. 7 of EU Regulation, you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to lodge a complaint:** according to art. 77 of EU Regulation, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of your personal data infringes this Regulation.

## 7. Further information

For further information, for consulting our privacy policy or for receiving an abstract of the articles of the EU Regulation, you can write to the Controller's e-mail address [privacy@smigroup.net](mailto:privacy@smigroup.net). Your requests to exercise your rights can be sent in writing to the Controller, together with a valid identity document.

## 8. Co-operation

Data protection and compliance with the EU Regulation, especially with transparency principle, are crucial values for our Group; we would be grateful if you could help us by notifying the Controller of any difficulties of intelligibility or suggesting any improvements to be adopted.