

The company KEMPER SRL, based in via PONTE ROSSO, snc, 25020 DELLO (BS), Fiscal Code 03417030172 and VAT number 02107240984, (hereafter, "Data Controller"), as data controller, informs you pursuant to art. 13 EU Regulation n. 2016/679 (hereinafter, "GDPR") that it bases the processing of data on the principles of correctness, lawfulness, transparency and necessity, as required by the aforementioned regulations and that your data will be processed in the manner and for the following purposes:

### **1. Object of the processing**

The Data Controller processes personal data, identifying and non-sensitive data (specifically, name, surname, tax code, VAT number, email address, telephone number - hereafter, "personal data" or even "data" that you have communicated:

- when registering on the website of the Data Controller.
- upon registering for the newsletter service offered by the Data Controller.
- when the Data Controller responds to the request for information from users / subscribers of the site.

### **2. Purpose of the Processing**

Your data are processed:

A) without your express consent [Article 6 letter b) and e) of the GDPR], for the following Service Purposes:

- close the contracts for the goods / services of the Data Controller.
- fulfill the pre-contractual, contractual and tax obligations deriving from existing relationships with you.
- allow you to register on the website of the Data Controller.
- answer to your questions posed by means of the form to be filled out on the website of the Data Controller.
- manage and maintain the website of the Data Controller.
- allow you to subscribe to the newsletter service provided by the Data Controller and any additional Services you may have requested.
- fulfill the obligations established by the Law, by a regulation, by the Community legislation or by an order of the Authority (such as for Anti-Money Laundering)
- exercise the rights of the Data Controller, for example the right to defense in court.

B) Only in the case of prior specific and distinct consent (Article 7 GDPR), for the following Marketing Purposes:

- Sending by via e-mail, and / or sms and / or telephone contacts, newsletters, commercial communications and / or advertising material about products or services offered by the Data Controller and survey of the degree of satisfaction on the quality of goods / services.

### **3. Processing Modalities**

The processing of your personal data is carried out by means of the operations indicated in art. 4 n. 2) GDPR and more precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.

Your personal data are subjected to both paper and electronic and / or automated processing.

The Data Controller will process personal data for the time necessary to fulfill the previous purposes and in any case for no more than 10 years from the termination of the relationship for the Service Purposes and for no more than 3 years from the collection of data for the Marketing Purposes.

#### **4. Access to Data**

Your data may be made accessible for the purposes referred to in art. 2.A) and 2.B) of this information:

- to employees and collaborators of the Data Controller, in their capacity as persons in charge and / or internal managers of the processing and / or system administrators;

- to third-party companies or other subjects (providers for the management and maintenance of the website, suppliers, credit institutions, professional firms) who carry out outsourced activities on behalf of the Data Controller, in their capacity as external data processors.

#### **5. Communication of Data**

Without the need for your express consent (Article 6 letter b) and c) GDPR), the Data Controller may communicate your data for the purposes referred to in art. 2.A) to Supervisory Bodies, Judicial Authorities as well as to all other subjects to whom communication is mandatory by law for the accomplishment of the aforementioned purposes. These subjects will process the data in their capacity as independent data controllers. Your information will not be disseminated.

#### **6. Data Transfer**

The management and storage of personal data will take place on servers located within the European Union of the Data Controller and / or third-party companies appointed and duly appointed as Data Processors. The data will not be transferred outside the European Union. In any case, it is understood that the Data Controller, if necessary, will have the right to move the location of the servers to Italy and / or the European Union and / or non-EU countries. In this case, the Data Controller ensures from now on that the transfer of non-EU data will take place in compliance with the applicable legal provisions by stipulating, if necessary, agreements that guarantee an adequate level of protection and / or adopting the standard contractual clauses provided for by European Commission.

#### **7. Nature of the provision of data and consequences of refusal to reply**

The provision of data for the purposes referred to in art. 2.A) is mandatory. In their absence, we will not be able to guarantee you neither the registration on the site nor the services of art. 2.A).

The provision of data for the purposes referred to in art. 2.B) is optional. You can therefore decide not to provide any data or to subsequently deny the possibility of processing data already provided: in this case,

you will not be able to receive newsletters, commercial communications and advertising material relating to the Services offered by the Data Controller or any business partner. In any case, you will continue to be entitled to the Services referred to in art. 2.A).

## **8. Rights of the data subject**

In your capacity as an interested party, you have the rights referred to in art. 15 GDPR and precisely the rights of:

- i. obtain confirmation of the existence or not of personal data concerning you, even if not yet registered and their communication in an intelligible form;
- ii. obtain the indication: a) of the origin of the personal data; b) the purposes and methods of the processing; c) of the logic applied in case of treatment carried out with the aid of electronic instruments; d) the identity of the owner, manager and the representative appointed pursuant to art. 3, paragraph 1, GDPR; e) the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the State, managers or agents;
- iii. obtain: a) updating, rectification or, when interested, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including data which need not be kept for the purposes for which the data were collected or subsequently processed; c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case in which this fulfillment is proves impossible or involves the use of means that are manifestly disproportionate to the protected right;
- iv. object, in whole or in part: a) for legitimate reasons to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by email and / or through traditional marketing methods by telephone and / or paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the interested party to exercise the right of opposition also only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or neither of the two types of communication.

Where applicable, it also has the rights referred to in Articles. 16-21 GDPR (Right of rectification, right to be forgotten, right to limitation of treatment, right to data portability, right of opposition), as well as the right of complaint to the Guarantor Authority.

## **9. How to exercise rights**

You can exercise your rights at any time by sending:

- a registered letter with return receipt to KEMPER SRL, via PONTE ROSSO, snc, 25020 DELLO (BS)
- an e-mail to the address: [privacy@kemper.it](mailto:privacy@kemper.it)

## **10. Data Controller, Data Processor and people appointed**

The Data Controller is KEMPER SRL, based in via PONTE ROSSO, snc, 25020 DELLO (BS), Fiscal Code 03417030172 and VAT number 02107240984.

The updated list of data processors and persons in charge of processing is kept at the headquarters of the Data Controller.