












**INFORMATION NOTICE REGARDING THE PROCESSING OF CUSTOMERS' PERSONAL DATA
IN ACCORDANCE WITH EU REGULATION 2016/679 ("GDPR")**

	DATA CONTROLLER	<p>Company name: Each company (<i>IdB Holding SpA, Indena SpA, Bernett Srl, Indena SaS</i>), part of the corporate Group IdB Holding, as Data Controller.</p> <p>The Data Controller can be reached at the e-mail address: privacy@idbholding.com ("Company")</p>
	DATA PROTECTION OFFICER (DPO)	<p>The Data Protection Officer of each company of the group (IDB Holding S.p.A.) is Partners4Innovation S.r.l., Via Copernico 35, 20125 Milano (tel. 02/92852779), and can be reached at the e-mail address: dpo@idbholding.com</p>

	<p>PERSONAL DATA PROCESSED</p> <p>"Data" means those relating to natural persons processed by the Company.</p> <p>By way of example but not limited to: name, surname, date and place of birth, residence, e-mail address, telephone numbers, ID number, VAT number etc.</p>
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	DATA PROCESSING PURPOSES		LEGAL BASIS FOR PROCESSING DATA		DATA RETENTION PERIOD
	Conclusion and continuation of the contract and all related fulfilments		Execution of the contract involving the data subject.		Contractual duration and, after its termination, for the statutory limitation period of 10 years.
	Fulfillment of regulatory and legal obligations as foreseen by applicable national and international laws		Necessity to fulfill an obligation imposed by law.		For the duration of any legal disputes until completion of the terms of implementation outlined in legal remedies.
	If necessary, to ascertain, exercise and/or safeguard Company rights in legal proceedings		Legitimate interest (recovering due receivables)		
	Out-of-court debt recovery		Legitimate interest (legal protection)		
	Direct marketing activities : by way of example, sending - by automated means of contact (such as sms, mms and e-mail) and traditional means (such as telephone calls with operator and traditional mail) - promotional and commercial communications relating to services/products offered by the Company or to corporate events, as well as carrying out market studies and statistical analysis		Consent (which is optional and can be withdrawn at any time)		<p>Personal data and contact details: until the withdrawal of consent.</p> <p>Data relating to marketing activities will be processed for 24 months.</p>
<p>Once the aforementioned retention period has expired data will be destroyed or made anonymous compatibly with technical erasure and backup procedures and with the accountability requirements of the Data Controller.</p>					

	DATA PROVISION
	<p>The provision of data is necessary for the conclusion and/or execution of the contract; the refusal to provide such data does not allow, therefore, to use the services.</p> <p>The provision of data for marketing purposes is entirely optional: these activities will be carried out only with your express and unequivocal consent, without prejudice to your right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent before such withdrawal.</p>
	DATA RECIPIENTS
	<p>Data may be communicated to parties acting as data controllers such as e.g. supervisory and regulatory authorities and, more generally, public or private entities, legally authorised to requests data.</p> <p>The data may be processed, on behalf of the data controller, by other companies belonging to the Group and by external parties designated as data processors (according to art. 28 of the GDPR), who carry out specific activities on behalf of the data controller (for example, accounting, tax and insurance obligations, shipment of correspondence, management of collections and payments, etc.).</p>
	PARTIES AUTHORISED TO PROCESS DATA
<p>Data may be processed by employees and/or collaborators of the Data Controller/Data Processor who have been expressly authorised to process the data and have received adequate operating instructions.</p>	
	PERSONAL DATA TRANSFERS OUTSIDE THE EU
<p>The data may be transferred abroad to non-European countries in accordance with the provisions of Articles 45 and 46 of the GDPR.</p>	
	DATA SUBJECTS' RIGHTS – COMPLAINT TO THE SUPERVISORY AUTHORITY
	<p>By contacting the Data Protection Committee via e-mail to the address privacy@idbholding.com data subjects can ask the controller for access to their personal data, their rectification, their cancellation, the restriction of the processing in the cases provided for by art. 18 GDPR, as well as the opposition to the processing, for reasons related to their particular situation, in the hypothesis of legitimate interest of the Data Controller.</p>
	<p>Furthermore, in the case where processing is based on consent or contract and is carried out with automated tools, data subjects have the right to receive the personal data in a structured, commonly used and machine-readable format, and to transmit the data to another data controller without obstruction.</p>
	<p>Data subjects have the right to withdraw their consents at any time for marketing purposes. The possibility for the data subject who prefers to be contacted exclusively through traditional methods, to oppose the processing for marketing purposes only in relation to the receipt of communications through automated means, remains unchanged.</p>
<p>Data subjects have the right to lodge a complaint to the competent Supervisory Authority in the member state where they are resident or where they work, or the member state where the alleged breach took place.</p>	