

## PRIVACY DISCLAIMER

Dear Sir/ Madam,

atp di f. garzoni with registered office in Via del Tram, 8  
25074 LAVENONE (BS) Italy, VAT Number IT 00232730986,  
in the capacity of the data controller,  
informs you pursuant to art. 13 of legislative decree 30.6.2003 nr. 196 (hereinafter, "Privacy Code")  
and to art. 13 of EU Regulation nr. 2016/679 (hereinafter, "GDPR")  
that your data will be processed with the following methods  
and for the undermentioned purposes:

1. The data controller processes personal and identification data  
(such as: name, surname, business name, address, telephone number,  
email address, bank & payment references - hereinafter "personal data" or also "data")  
communicated by you to the writer  
on the occasion of the conclusion of a contract for the offered services.

### 2. Purposes of the treatment

Your personal data are processed without your express consent  
(art. 24, letters a), b), c) Privacy Code and art. 6, letters b), e) GDPR),  
for the following purposes:

- concluding the contracts for the services offered by the data controller atp;
- fulfilling the pre-contractual, contractual and tax obligations  
deriving from the ongoing business relationship with you;
- fulfilling the obligations deriving from law, EU regulation,  
or by order of the authorities (for example on the subject of money laundering);
- exercising the rights of the data controller, for example the right of defense in legal cases.

### 3. Modalities of data processing

The processing of your personal data is carried out  
by means of the operations indicated in art. 4 Privacy Code and art. 4 nr. 2) GDPR,  
in particular: collection, recording, organization, storage, consultation, processing, alteration, selection, extraction,  
comparison, use, interconnection, block, disclosure, erasure and destruction of data.  
Your personal data are processed both in paper and digital form.  
The data controller will process and store your personal data for the time necessary  
to fulfill the aforementioned purposes  
and in any case for not longer than 10 years from the termination  
of the relationship for the service purposes.

### 4. Access to data

Your data can be accessed for the purposes referred to in art. 2:

- by employees and collaborators of the data controller, in their capacity as  
persons in charge and / or internal persons responsible for the processing  
and / or system managers;
- by third parties or other parties (by way of example, credit institutes, professional firms,  
consultants, insurance companies for the provision of insurance services, etc.)  
who carry out outsourced activities on behalf of the data controller,  
in their capacity as external persons responsible for the processing.

### 5. Disclosure of data

Without the necessity of an express consent  
(ex art. 24 lett. a), b), d) of the privacy code and article 6 letter b) and c) of the GDPR),  
the data controller can communicate your data for the purposes referred to in art. 2 to:  
supervisory bodies (such as IVASS), judicial authorities,  
insurance companies for the provision of insurance services,  
as well as those parties to whom the communication is mandatory by law  
for the fulfillment of the aforementioned purposes.  
These parties will process the data in their role as autonomous data controllers.  
Your data will not be disseminated.

## 6. Security

The data are stored and controlled, in electronic and paper form, by adopting appropriate preventive security measures, aimed at minimizing the risks of loss, destruction, unauthorized access and non-authorized processing different from the purposes for which the processing is carried out .

## 7. Data transfer

The management and storage of personal data will take place in the Italian territory.

## 8. Rights of the data subject

As data subject, you are entitled to the rights referred to in art. 15 of the GDPR and specifically to the right to:

- i. obtain the confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible manner;
- ii. obtain information about the following matters:
  - a. the origin of the personal data
  - b. the scope and modality of the data processing
  - c. the logic applied in case of processing performed with the aid of electronic devices
  - d. the identity of the data controller, the responsible persons and the representatives, as provided for by article 5 subsection 2 of the Privacy Code and article 3 subsection 1 of the GDPR.
  - e. the recipients or categories of recipient to whom the personal data can be disclosed or who can become aware of the personal data in their capacity of designated representative in the State's territory, as responsible persons or appointees.
- iii. demand:
  - a. the updating, amendment or integration of the data
  - b. deletion, anonymization, or blocking of unlawfully processed data including data that does not need to be retained for the purposes for which it was collected or subsequently processed;
  - c. the confirmation that those to whom the data is communicated or disclosed are notified of the actions referred to under points (a) and (b), including their content, unless the fulfilment thereof proves impossible or involves the use of means that are clearly disproportionate to the right being protected.
- iv. The interested party has the right to oppose, in whole or in part, on legitimate grounds the processing of his/her personal data, even if the data is relevant for the purpose of their collection; Where applicable, you also have the right referred to in articles 16-21 of the GDPR (right of rectification, right to be forgotten, right of limitation of treatment, right to data portability, right of opposition), as well as the right of complaint to the competent Authority.

## 9. Methods of exercising rights

You can exercise your rights at any time by sending a communication:

- a. via regular email, to the address [qualita@atp.it](mailto:qualita@atp.it), or
- b. via certified email to the address: [qualita@pec.atp.it](mailto:qualita@pec.atp.it), [commerciale@pec.atp.it](mailto:commerciale@pec.atp.it)

This disclaimer may be subject to change.

In case of substantial changes the user will be notified.