

VISITOR PRIVACY POLICY

Rendered pursuant to art. 12, 13 and 14 of Regulation (EU) 2016/679

SCHMUCKER s.r.l.

Registered and operational headquarters: Via Riva Rossa n. 12 – 34076 Romans D'Isonzo (GO)

P.IVA C.F/Registro imprese: IT 0373660315 - Cod. REA: GO - 47437

PEC: schmucker@legalmail.it

Telephone +39 0481.909464

email: privacy@schmucker.it

1 TABLE OF CONTENTS

| | | |
|-----------|---|---|
| 1 | TABLE OF CONTENTS | 2 |
| 2 | RECIPIENTS OF THE DOCUMENT | 3 |
| 3 | PREMISE | 3 |
| 4 | PURPOSE OF THE DOCUMENT | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 5 | DEFINITIONS..... | 3 |
| 6 | DATA CONTROLLER OF PERSONAL DATA AND EMPLOYMENT RELATIONSHIP | 3 |
| 7 | PURPOSE OF THE PROCESSING | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 8 | FURTHER TREATMENTS | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 9 | PERSONAL DATA SUBJECT TO PROCESSING | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 9.1 | PERSONAL DATA..... | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 9.2 | SPECIAL CATEGORIES OF DATA..... | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 9.3 | INFORMATION ON CRIMINAL CONVICTIONS | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 10 | PRINCIPLES APPLICABLE TO DATA PROCESSING | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 11 | MANDATORY OR OPTIONAL NATURE OF THE PROVISION OF DATA | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 12 | LEARN MORE ABOUT RETENTION..... | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 13 | METHODS OF PROCESSING..... | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 13.1 | AUTOMATED DECISIONS | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 13.2 | SAFETY | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 14 | SCOPE OF COMMUNICATION AND DISSEMINATION OF DATA..... | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 15 | TRANSFER OF DATA ABROAD | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 16 | RIGHTS OF THE DATA SUBJECT | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 17 | COMPLAINT TO THE SUPERVISORY AUTHORITY (ART. 77 GDPR) | ERRORE. IL SEGNA LIBRO NON È DEFINITO. |
| 18 | UPDATE OF THE POLICY | 6 |
| | ANNEX A..... | 6 |
| | CANDIDATE'S DECLARATION | <i>Errore. Il segnalibro non è definito.</i> |

2 RECIPIENTS OF THE DOCUMENT

This information is issued to you regarding the acquisition of your personal data following your request for access to the premises of as a guest/visitor. **SCHMUCKERs.r.l.**

3 PREMISE

In compliance with the indications provided for by Regulation (EU) 2016/679 (hereinafter, "Regulation" or "GDPR") on the processing and free movement of personal data, you have the right to know all information regarding the processing of your personal data in a clear and transparent manner. Therefore, in accordance with this principle, we intend to inform you hereby about the processing of your personal data.

4 DEFINITIONS

The definitions of the terms used in this document are to be understood as per Article 4 of [EU Regulation 2016/679](#).

5 DATA CONTROLLER OF PERSONAL DATA AND EMPLOYMENT RELATIONSHIP

SCHMUCKER s.r.l. (hereinafter simply) is the Data Controller **SCHMUCKER** of your personal data pursuant to the Regulation. The following is the contact information:



SCHMUCKER s.r.l.

Registered and operational headquarters: Via Riva Rossa n. 12 – 34076 Romans
D'Isonzo (GO)

C.F./ P.IVA IT 0373660315- Cod. REA: GO - 47437

PEC: schmucker@legalmail.it

Telephone +39 0481.909464

email: privacy@schmucker.it

6 TREATMENT

6.1 WHY WE ASK YOU FOR YOUR DATA

Personal data relating to you and all other relevant information voluntarily provided to us by you or your organisation or inferred by us during your visit (hereinafter referred to as the "Data") will be processed to enable your secure access to our premises. This will involve your identification (e.g. we will see your identity document) and the recording of certain identification and contact data.

In addition, from the information collected, we may verify your presence on our premises or contact your organization in the event of an accident or disaster.

6.2 WHAT ARE THE PURPOSES

- F1. ensure the security of access to our restricted areas;*
- F2. prevent crimes and/or abuses and take protective actions to protect the interests of the Company or those of third parties, such as, for example, exercising legal defence and/or asserting rights;*
- F3. to ensure the safety and health of visitors within our premises in the event of accidents, disasters or necessities;*
- F4. to comply with legal obligations, regulations and EU legislation, or deriving from instructions given by public authorities or supervisory bodies;*
- F5. achieve, maintain and demonstrate certifications or accreditations, comply with regulatory standards apply specific codes of ethics, conduct or deontological codes;*
- F6. (if any) to comply with our confidentiality obligations by transferring these obligations to our visitors, by having appropriate NDAs entered into in accordance with the information that the visitor may become aware of, even accidentally, during his visit.*

6.3 WHY WE CAN DO IT

For the purposes set out above, we may process your personal data on the basis of the following lawful bases.



LEGITIMATE INTEREST pursuant to Article 6, paragraph 1, letter f) of the GDPR.

We believe it is in our legitimate interest to pursue the **F1, F2, F3** and **F5** purposes and to carry out all the processing deemed necessary to ensure adequate protection of our assets, the safety of our visitors, to achieve/maintain certifications and accreditations with customers and to comply with industry standards.



LEGAL OBLIGATION pursuant to Article 6(1)(c) GDPR.

For purpose **F4**, the processing of your personal data will be carried out to comply with legal obligations or measures of the Authorities. For example, the obligations established by Legislative Decree 81/2008 on workplace safety or measures of the Authority for the containment of the health emergency.



CONTRACTUAL OBLIGATION pursuant to Article 6(1)(b) of the GDPR.

For purpose **F6**, the processing is necessary for the fulfilment of contractual obligations to which we are obliged.

6.4 WHERE YOUR PERSONAL DATA COMES FROM

The data is generally provided by you to our authorized personnel by filling in the appropriate access registration form (register) or during your stay on our premises. However, some information about you may be provided by your organization or collected by us during your visit.

6.5 WHAT TYPE OF PERSONAL DATA WILL BE PROCESSED

- name, surname, company, date, time of entry and exit;
- a document of his/her if we do not have an identity already identified in another way;
- his signature;
- reason for the visit, any accompanying assets;
- any statements or other relevant information that you voluntarily provide or that we obtain during your visit.

6.6 MANDATORY OR OPTIONAL NATURE OF THE PROVISION OF DATA

The provision of your personal data, while voluntary and voluntary, is a binding requirement to gain access to specific areas of our company. In addition, the registration of your presence within our premises may, in some cases, be mandatory to comply with the obligations of specific laws on health safety in the workplace (e.g. Legislative Decree 81/2008).

6.7 RETENTION CRITERIA OR TIMES

For purposes **F1, F2** and **F5**, we will retain your personal data for a period of **24 months**. This period is deemed appropriate to meet our organizational needs regarding any investigation of security breaches, provided that it is not necessary to retain them further to defend or enforce a right, or any additional legal obligation, or, finally, at the order of the Public Authorities. For purpose **F3**, your data may be deleted the day after registration (achievement of the purpose), however, the access log is unique and the purposes are therefore unified at the same retention times.

For purpose **F4** we will store your personal data for the limitation period provided for by the legislation for the protection of related rights, without prejudice in any case to longer retention periods provided for by specific sector regulations.

For purpose **F6**, the documents will be kept for the entire duration of the confidentiality bond and thereafter for 20 years.

7 FURTHER TREATMENTS



If, during your visit, further and specific processing is necessary, not indicated in this policy, you will take care to provide you and/or your Organization with specific information in advance and, if necessary, proceed to acquire the necessary consent. **SCHMUCKER**

8 PRINCIPLES APPLICABLE TO DATA PROCESSING

From the moment of collecting information, any processing we carry out will comply with the principle of relevance and non-excessiveness by virtue of the purposes pursued by the same. We inform you that access to your personal data by the persons in charge is allowed only if knowledge is deemed strictly indispensable for the pursuit of the purposes illustrated in this document.

9 METHODS OF PROCESSING

With logics strictly related to the purposes of collection, we adopt and observe strict procedures and security measures to store, use and allow you to view your personal data using paper, computer and telematic tools, so as to always guarantee their protection from unauthorized or unlawful processing and from loss, destruction or accidental damage. **SCHMUCKER** In particular, your data are:

- collected exclusively for the purposes declared and subsequently processed in compliance with the same;
- adequate, relevant and limited with respect to the purposes stated above ("so-called data minimization");
- accurate and, if necessary, updated, deleted and/or corrected, also on the basis of your indications, if any;
- used and stored for a period of time not exceeding the achievement of the purposes for which they are collected.

10 SECURITY OF PERSONAL DATA

SCHMUCKER has taken steps to assess the risks to the rights and freedoms of the data subjects involved in the processing operations stated in this policy, also considering the risks looming over the IT systems used for such processing. The risks were then assessed, analyzing the sources of risk and mitigating the threats capable of realizing them through the adoption of technical and organizational measures deemed appropriate.

11 SCOPE OF COMMUNICATION AND DISSEMINATION OF DATA

In order to pursue the declared purposes and within the limits of what is strictly necessary, **SCHMUCKER** it makes use of the activities of external parties with whom specific agreements are entered into on the processing of personal data to regulate the relationships of **Ownership/Responsibility** pursuant to the Regulation (e.g. external parties that carry out technical, commercial, legal, administrative consultancy activities, companies that provide IT services in the Cloud, data processing, shipping and transport services, banks, bodies, public administrations, authorities, supervisory bodies, etc.). Internally, the subjects involved in the processing of your personal data are bound to confidentiality, adequately trained and appointed as "Authorized" subjects to the processing.

Without prejudice to any legal obligations, your personal data will not be disseminated in any way except for the purposes referred to in art. 5.2.

12 TRANSFER OF DATA ABROAD

For the purposes stated in this policy, we do not transfer your data outside the European Economic Area (EEA). **SCHMUCKER**

13 RIGHTS OF THE DATA SUBJECT

As a data subject in the processing of your personal data, you may exercise at any time the rights recognized by articles 15 to 22 of the Regulation.

In particular, in the manner and within the limits of the law, you have the right to ask our Company for access to your personal data, rectification, erasure or limitation of the processing of personal data concerning you and to object to their processing. To exercise your rights, you can use the contact channels provided in this document.



You can obtain more information on the rights applicable to the processing stated in this policy in [ANNEX A](#)

14 COMPLAINT TO THE SUPERVISORY AUTHORITY (art. 77 GDPR)

Without prejudice to the possibility of contacting to obtain any information or to exercise your rights, we inform you that you may lodge a complaint with the competent independent administrative authority in the Member State of the European Union where you habitually reside, where you work, or where you believe there has been an alleged violation of the law on the protection of your personal data. In Italy, you can lodge a complaint with the Italian Data Protection Authority (GPDP). **SCHMUCKER**

For information on how to submit your complaint to the Authority, you can use the following contact details:



Guarantor for the protection of personal data

Switchboard: +39 06.696771
E-mail address: garante@gdpd.it
PEC address: protocollo@pec.gdpd.it
Website: <https://www.garanteprivacy.it>

15 UPDATE OF THE POLICY

The document is periodically revised according to regulatory and/or corporate changes.

In the event of a change in its fundamental parts (such as the purposes, methods, to whom we communicate the data, where we transfer it, etc.) it will be the responsibility of our company to inform you of the change.



You can find the updated version of this policy on the institutional website of **SCHMUCKERs.r.l.**

ANNEX A

**GUIDE TO THE EXERCISE OF THE RIGHTS APPLICABLE TO THE PROCESSING DECLARED IN THE INF-MOP
VISITOR INFORMATION 08 VER. 01 OF 20/11/2024****RIGHT OF ACCESS (Art. 15 GDPR)**

As a data subject, you have the right to obtain confirmation as to whether or not we are processing personal data concerning you and, if so, to obtain access to the following information:

1. the purposes of the processing;
2. the categories of personal data concerned;
3. the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if recipients are from third countries or international organisations;
4. where possible, the envisaged retention period for personal data or, if this is not possible, the criteria used to determine that period;
5. the existence of the right of the data subject to request from the data controller the rectification or erasure of personal data or the restriction of the processing of personal data concerning him or her or to object to their processing;
6. the right to lodge a complaint with a supervisory authority;
7. if the data have not been provided directly by you, all available information on their origin;
8. the existence of automated decision-making, including profiling and, at least in such cases, meaningful information about the logic used, as well as the consequences of such processing for you;
9. if your personal data is transferred to a third country or to an international organisation, you have the right to be informed of the existence of appropriate safeguards in accordance with Articles 45-50 of the GDPR.



You will only have the right to obtain a copy of the data if it is possible to do so without adversely affecting the rights and freedoms of others. If you decide to exercise this right, we will provide you with a copy of the personal data being processed. **If you request additional copies, we may charge you a fee based on our administrative costs.**

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of its lawful basis. Especially:



Specific conditions of non-applicability

☒ None

RIGHT TO RECTIFICATION (Art. 16 GDPR)

You have the right to obtain from us the modification and updating of your personal data without undue delay. Taking into account the purposes of the processing, you have the right to obtain the completion of your incomplete personal data, including by providing us with a supplementary statement.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of its lawful basis. In particular, it is applicable to the following treatments:



Specific conditions of non-applicability

☒ None

RIGHT TO ERASURE "RIGHT TO BE FORGOTTEN" (Art. 17 GDPR)

You have the right to obtain the erasure of personal data concerning you without undue delay.

Conditions of applicability

We grant you this right for the following processing, where one of the following reasons exists:


1. When the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

☒ None

2. if you have withdrawn the consent on which the processing is based and there is no other legal basis for continuing it without your consent. The law does not apply to any of the processing operations stated in this policy:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

☒ The law is not applicable as none of the processing bases its lawfulness on consent

3. If you object to the processing and there is no overriding legitimate reason on our part to proceed with the processing anyway:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

☒ The law is not applicable to **F4 and F6** processing as they are not based on legitimate interest

4. if personal data are processed unlawfully:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|


5. if personal data needs to be erased in order to comply with a legal obligation to which we are subject as a Data Controller:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

☒ None

6. If personal data has been collected in connection with the provision of information society services:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

☒ The law does not apply to any of the processing operations stated in this policy.

RIGHT TO RESTRICTION OF PROCESSING (Art. 18 GDPR)

This right is guaranteed for all processing carried out by us regardless of the lawful basis used.



Personal data subject to restriction are processed, except for storage, only with your consent or for the establishment, exercise or defense of legal claims or to protect the rights of another natural or legal person. In addition, we inform you that the data subject who has obtained the restriction of processing is informed by the controller before this restriction is lifted

Conditions of applicability

You have the right to obtain the restriction of processing when one of the following applies:

1. You have contested the accuracy of the personal data; The restriction will apply for the period necessary to allow us to verify the accuracy of such data:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

☒ None

2. the processing is unlawful and you oppose the erasure of your personal data by requesting, instead, that its use be limited:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

☒ None

3. Although we no longer need it for the purposes of the processing, the personal data is necessary for you to establish, exercise or defend legal claims:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

☒ None

4. You have objected to the treatment; The restriction will be applied pending verification of whether our legitimate reasons for continuing it prevail:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

☒ The law is not applicable to **F4** and **F6** processing as it is not based on legitimate interest.

RIGHT TO NOTIFICATION (Art. 19 GDPR)

You have the right to obtain from us a direct communication to each of the recipients to whom your personal data has been disclosed, regarding your requests for rectification or erasure or restriction of processing, unless this proves impossible or involves a disproportionate effort. In addition, if you deem it appropriate, you have the right to obtain the list of recipients of your data.

Conditions of applicability

This right is guaranteed for all processing carried out by us regardless of the lawful basis used:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

☒ None

RIGHT TO DATA PORTABILITY (art. 20 GDPR)

You have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format and you have the right to obtain from us the direct transmission of such data to another controller if technically feasible.

Conditions of applicability

This right is only guaranteed for processing operations that have consent or contract as their legal basis and are carried out by automated means:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

- ☒ The law does not apply to the processing operations stated in this policy

RIGHT TO OBJECT (Art. 21 GDPR)

You have the right to object at any time to the processing of your personal data based on our legitimate interest, including profiling.



We will only refrain from further processing your personal data if we cannot demonstrate compelling legitimate grounds for doing so over your interests, rights and freedoms. The processing will continue even if the data is necessary for the establishment, exercise or defence of our rights or those of third parties in litigation.

Conditions of applicability:

The legal basis for the processing must be legitimate interest. The law is applicable to the following processing operations:

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

- ☒ The right is not applicable to processing carried out for purposes **F4** and **F6** as it is not based on legitimate interest and to processing carried out for purpose **F2** when necessary for the assessment and defense in litigation.

SPECIFIC RIGHTS IN THE CASE OF AUTOMATED DECISION-MAKING (Art. 21 GDPR)

You have the right not to be subject to a decision based solely on automated processing (including profiling) which produces legal effects concerning you or significantly affects you in a similar way. In addition, you have the right to obtain human intervention from the Controller, to express your opinion and to contest the automated decision.

In any case, decisions should not be based on the special categories of personal data referred to in Article 9(1) of the GDPR, unless Article 9(2)(a) or (g) of the GDPR applies, and appropriate measures are in place to protect your rights and freedoms.

Conditions of applicability

The right does not apply if the decision:

- is necessary for the conclusion or performance of a contract between us;
- is based on your explicit consent;
- the decision is authorised by Union or Member State law.

| | | | | | | |
|---|----|----|----|----|----|----|
|  | F1 | F2 | F3 | F4 | F5 | F6 |
|---|----|----|----|----|----|----|

Specific conditions of non-applicability

- ☒ The right does not apply to any of the processing operations stated in this policy as none of them subjects the data subject to a decision based solely on automated processing.

RIGHT TO COMPENSATION FOR DAMAGES (Art. 82 GDPR)

We inform you that anyone who suffers material or immaterial damage caused by a violation of Regulation 2016/679 has the right to obtain compensation for such damage.

FORMS FOR EXERCISING RIGHTS

To exercise your rights towards , we recommend that you use the following form made available by the Data Protection Authority: **SCHMUCKER**

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>

We remind you that your identification is always necessary on our part.