Information for clients (distributors, salons, stores, participants at education events, etc..), suppliers and partners and other collaborators according to legislation art. 13 and 14 of European Regulations n.16/679 and national legislation on data protection.

PANZERI DIFFUSION SRL, as owner of personal data, with headquarters in Malnate (VA), Via Brodolini, 30 VAT n. 02879900120, with this informative circular, wishes to inform physical people who work on behalf of and for suppliers, clients, partners and other collaborators involved in contractual or pre-contractual work, according to legislation art. 13 and 14 of REG EU 679/16 "European Regulations on data protection", and national legislation on data protection.

DATA INVOLVED	 The data used is personal data and contacts given or received by the person in question: during visits, phone calls or emails; direct contacts obtained after events (including education courses) organised by Panzeri Diffusion, etc.; indirect contacts after events held via our distributors or in partnership with our distributors; requests for commercial information, offers, (products and services, including educational events organised by Panzeri Diffusion SRL); requests for commercial information, offers forwarded by our distributors (products and services); requests via our website or the websites of our suppliers, clients, partners and other collaborators communication and transactions following the order of services or goods

PURPOSE AND CONDITIONS THAT MAKE THE USE OF PERSONAL	The personal data of physical people who operate on behalf of or for suppliers, clients, partners and other collaborators, is used to:
DATA LAWFUL	 a) forward information using diverse means (phone, mobile, sms, email, fax, letters, etc.);
	b) give information regarding the sales force;
	 c) give the possibility to access discounts, promotions, and to take part in events (including education) organised by Panzeri Diffusion;
	 d) make requests or deal with received requests, even via our distributors and agents;
	 exchange information with the purpose of executing a contractual agreement, including and pre or post contractual activities, including assistance and education;
	f) for ancillary purposes, such as "News Alerts";
	g) To deal with disputes.
	The purposes referred to in points b) and c) are limited to customers only (even if only for education events)

LEGISLATIVE MOTIVATION	The use of personal data is necessary to execute a contract with participating parties or to carry out the execution of pre-contractual or post- contractual measures taken upon request by the supplier, client, partners or other
	collaborators of PANZERI DIFFUSION SRL. Furthermore, specifically for purposes
	b) and c), the legal basis is represented by the legitimate interest of the owner to promote their products and services to customers who have already come into contact with Panzeri and therefore presumably interested in the company's offers.

OBLIGATION TO PROVIDE DATA	The person in question can refuse to give the company their personal data. However, the use of personal data is necessary for a correct and efficient management of contractual agreements with suppliers, clients, partners and other collaborators involved in activities with the company. Hence, any refusal to allow for the use of personal data may compromise, entirely or in part, the contractual agreements or any pre or post contractual activities.

HOW DATA IS USED	Personal data will be used via manual or automatic systems including databases, lists and directories suitable for storage, management and communication of data, in the methods and limits necessary to fulfil the pre-empted purposes. PANZERI DIFFUSION SRL has taken suitable safety measures to protect the data of physical people who work on behalf of or for suppliers, clients, partners and other collaborators, such as: Firewalls, antivirus packages, back-ups. The data will
	be used exclusively by authorised personnel within PANZERI DIFFUSION SRL, according to the purpose of using such data.

WHO RECEIVES THE DATA	Personal data used by the company will not be shared, or rather, will not be made known to undefined parties, in any shape or form, including being made available for consultation. The data can be communicated to employees of the company and certain external collaborators, respecting the indicated purposes. Particularly, employees/collaborators who, based on their roles and tasks, are allowed to deal with personal data, limited to their competences and in conformity with the instructions given by the company. Furthermore, it may be communicated to other parties only when strictly necessary, for those people who need to carry out our orders or requests for information or quotes or offers or services from us, who must give goods and/or carry out services on our behalf, such as agents, distributors or educators. Certain technicians or external collaborators hired by the company for these services could access this information (for the purpose of assistance on SW applications, IT networks and connectivity). Finally, the data can be communicated to parties who may lawfully access this data for legal, regulatory, or European regulation purposes.
1	

SHARING OF DATA	Even if at the moment all the people who deal with personal data on behalf of PANZERI DIFFUSION srl operate as external managers of such data are within the EU, in the future it could be necessary to transfer such data to parties outside the EU, in countries which do not guarantee a suitable level of protection for personal data according to Data Protection/European Regulations RE. EU 679/2016 on data protection. Panzeri Diffusion will only transfer data outside of the EU after having taken the necessary precautions according to Data Protection and European Regulations and after having obtained the necessary guarantees and consent of the involved parties.
-----------------	---

STORAGE OF DATA	The owner of the data stores and uses personal data for the necessary amount of time and to complete the purpose of using such data. After that, personal data will be stored and no longer used for 10 years as requested per current legislation.
-----------------	--

PERSONAL RIGHTS	
	 According to legislation art. 7 of D. Lgs. 196/2003 and articles 15 and 22 of regulations, you have the right to: ask for confirmation of the existence of personal data; obtain information regarding the purposes, the categories of personal data or the categories of recipients to whom data has been or will be communicated and, when possible, for how long it will be stored; ask for the rectification or deletion of data; obtain limitations on the use of the data; obtain the portability of the data, in other words, receive the data from the owner of the data, in a structured format, for common use and readable via an automatic device, and transmit these to another owner of data without impediments:
	 data or the categories of recipients to whom data has been or will be communicated and, when possible, for how long it will be stored; ask for the rectification or deletion of data; obtain limitations on the use of the data; obtain the portability of the data, in other words, receive the data from the owner of the data, in a structured format, for common use and

DISPUTES	The interested party has the right to make any claims to their State of residence. For more information on filing complaints, please visit: https://goo.gl/GLbTN9
PRIVACY CONTACT	For any clarification, information, need to exercise rights, etc., it is possible to contact our Privacy contact for Panzeri Diffusion SRL via email: privacy@z-oneconcept.com.

Date of circular: May 2018

Updated: November 2020