ALDUS Italia S.r.l

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Customer and business contact privacy notice

ALDUS Italia S.r.l.

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This notice explains how we handle personal data relating to customers, prospective customers and people who represent our business partners. It covers enquiries, quotations, orders, deliveries, payments and ongoing business communications, including dealings under our General Terms and Conditions. It applies to individuals, including sole traders and contacts working for companies.

1 Who is responsible and how to contact us

ALDUS Italia S.r.l., Str. Salcido 89, Z.I. Squarzolo, 15046 San Salvatore Monferrato (AL), Italy, is the controller for the processing described in this notice. References to “we”, “us” and “our” mean this company. The relevant contracting company is identified in the quotation, order confirmation or contract.

For privacy questions or to exercise your rights, please email privacy@aldusgroup.com or write to the address above, marking your correspondence “Privacy”. Please identify the ALDUS company concerned so that your request can be directed correctly.

This notice is provided under the EU General Data Protection Regulation (GDPR) and applicable national data protection law. This notice supplements our Website Privacy Policy at https://www.aldusgroup.com/en/privacy-policy, which explains website cookies, analytics and embedded services. Receiving this notice does not constitute consent to marketing.

2 The information we handle and where it comes from

Depending on your dealings with us, information may include your name, employer, role, business email address, telephone number and business or delivery address; correspondence and meeting records; product enquiries, quotations, orders and service history; and invoicing, payment and transaction records. For individual traders, business records may also identify you personally.

We obtain information directly from you through enquiries and business dealings, or from the organisation you represent and colleagues involved in the transaction. Information may also reach us through another ALDUS company when an enquiry or account is referred to us. The data concerned depend on the referral and the business relationship.

We ask for information relevant to the business relationship. Please avoid including sensitive personal information in ordinary commercial enquiries. If information is required for an order, delivery, payment or a legal obligation, we will identify that requirement when collecting it. Without necessary details, we may be unable to provide a quotation, fulfil an order or respond to a request.

3 Why we use information and our legal grounds

Enquiries, quotations and performance of orders: we use contact and transaction information to communicate, prepare quotations, process orders, arrange deliveries and provide support. Where you are personally a party to the contract, or ask us to take steps before entering one, the legal basis is Article 6(1)(b) GDPR. Where you act for a corporate customer, the legal basis is Article 6(1)(f): our legitimate interests in dealing with that business and maintaining an effective customer relationship.

Accounts and business administration: we use necessary records for invoicing, payment administration, tax and statutory record keeping. Article 6(1)(c) GDPR applies where processing is necessary to comply with a legal obligation; Article 6(1)(f) applies to proportionate internal administration, reconciliation and management reporting. The relevant legal duties depend on the transaction and the applicable accounting and tax legislation.

Enquiries about previous transactions, disputes and security: Article 6(1)(f) GDPR supports our legitimate interests in resolving complaints, establishing or defending legal claims and protecting business records and systems. We consider the necessity of processing and its effect on individuals when relying on legitimate interests.

Business marketing: we use relevant business contact details to communicate about our products and services where the applicable marketing rules permit it. Where consent is required, the legal basis is Article 6(1)(a) GDPR. Where marketing is permitted without consent, Article 6(1)(f) supports our legitimate interest in promoting relevant products and maintaining business relationships. Existing customer status does not by itself remove any consent requirement.

You may object to direct marketing at any time by emailing privacy@aldusgroup.com or using an unsubscribe facility in the message. Consent can be withdrawn at any time without affecting the lawfulness of earlier processing. Newsletter subscriptions, opening and click tracking are explained in the relevant newsletter information and website privacy policy; receiving this notice is not consent to such tracking.

4 The systems used for our business relationship

We use HubSpot for customer relationship management within a shared ALDUS GROUP account. Information held there can include business contact details, correspondence, sales activity and customer service records. The account uses HubSpot's EU hosting region. Authorised users in other ALDUS companies can access information through this shared account; EU hosting does not mean access is confined to the EU.

We also use Infor Visual for business administration. These systems support the purposes set out above; the personal information involved depends on the records used for your account.

5 Who may receive information

Information is used by staff handling sales, customer service, finance, delivery and related administration. Recipients may include the ALDUS companies involved in supporting your enquiry or account; IT, hosting and communications providers supporting those activities; and delivery partners, banks, professional advisers and public authorities where required for the transaction, professional advice or compliance with law. The category involved depends on the service or transaction.

6 Group access and international transfers

Our shared HubSpot account supports ALDUS companies internationally. Access by a separate group company outside the European Economic Area (EEA), including overseas access to EU-hosted information, can constitute an international transfer. Such access may involve countries whose data protection rules differ from those applicable to us.

Transfers subject to the international transfer rules require a valid legal mechanism. Depending on the recipient and destination, this can be an applicable European Commission adequacy decision, or appropriate safeguards such as the European Commission's Standard Contractual Clauses, together with

any additional measures required by law. A service provider's transfer arrangements do not automatically cover separate access by other group companies.

Please contact privacy@aldusgroup.com for details of the recipients, destination countries and transfer mechanism applicable to your information, and to request a copy of relevant safeguards. We may redact information where necessary to protect confidential terms or the rights of others.

7 How long information is kept

Retention depends on the purpose and the applicable legal requirements. Enquiry and quotation records are kept while the enquiry is active and for an appropriate follow-up period. Customer and transaction records are kept for the business relationship and thereafter where needed for accounting, tax, product support or the establishment, exercise or defence of legal claims.

When deciding the retention period, we consider the type of record, the last relevant contact or transaction, applicable statutory retention and limitation periods, warranty or service obligations and any ongoing dispute. Records subject to a legal retention duty are retained for that period. Once information is no longer needed, it should be deleted or anonymised rather than retained merely because storage is available.

Marketing records are reviewed when you unsubscribe, withdraw consent or object. Limited suppression information may be retained to ensure that your preference continues to be respected. Please contact our privacy address for the retention period or criteria applicable to a particular record.

8 Your rights

Subject to the conditions and exceptions in applicable law, you can request access to your personal data, correction of inaccurate data, erasure, restriction of processing and, where the relevant conditions apply, data portability. You can withdraw consent where processing relies on it. We may ask for information reasonably necessary to verify your identity and locate the relevant records.

You may object, on grounds relating to your particular situation, to processing based on legitimate interests. We will then stop unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or processing is needed for legal claims. Your right to object to direct marketing, including related profiling, is unconditional.

9 Complaints

You can raise a concern with us at privacy@aldusgroup.com. You also have the right to complain to a competent supervisory authority. In Italy, this is the Garante per la protezione dei dati personali: https://www.garanteprivacy.it.

Where the EU GDPR applies, you may also complain to a supervisory authority in the EU Member State of your habitual residence, place of work or the alleged infringement. You do not have to contact us before exercising that right.

10 Changes and further information

We will update this notice when our processing changes. If we intend to use your information for a new purpose, we will provide the further information required by applicable law before doing so. Contact privacy@aldusgroup.com for the latest version or information about your particular business relationship.