

Re.AI.Color s.r.l.

dyestuffs, chemicals developments for leather

Main Plant:

Via dell'Artigianato, 38 (Z.I.) – 36045 LONIGO (Vicenza) ITALIA Telefono ++39 0444 835589-835599 –

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M/VI017504 – R.E.A. n. 156762/VI – Cap. Soc. € 100.000,00 i.v. <http://real-color.com> – E-mail: technical@real-color.com**Administration:**

Via del Lavoro, 81 Z.I. 36071 Arzignano VI ITALIA – tel ++39 0444 673509

PRIVACY POLICY**INTRODUCTION**

The protection of personal data is for the individual company Re.AI Color S.r.l. (hereinafter "Re.AI Color" or "Company") an important commitment.

The entry into force of Regulation (EU) 2016/679 "Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data, as well as on the free movement of these data "(hereinafter" GDPR ") provided the opportunity to further adapt the activities carried out by the Company to the principles of transparency and protection of personal data, while respecting the fundamental rights and freedoms of all those involved, whether they are employees, collaborators, customers, suppliers or third parties interested in receiving information.

In this way, Re.AI Color has implemented a "Privacy Organizational Model" (MOP) that is described here in its general lines, aimed at analysing all data processing, organizing them in a functional way and managing them in security and transparency. This section of the site also contains information on the rights of the data subject and the methods of exercise against the Data Controller.

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1 - ORGANIZATIONAL MODEL PRIVACY GDPR**1.1 - SUBJECTS****HOLDER OF THE TREATMENT**

The data controller is:

Re.AI Color S.r.l. (hereinafter also "OWNER")

Viale del Lavoro, n. 81, 36045 - Arzignano (VI)

Tel. +39 0444 673509

email: sales@real-color.com

Certified Electronic Mail: realcolor@legalmail.it

VAT number: 01269640247

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TEAM PRIVACY

The OWNER considered it appropriate to appoint an internal "Team privacy" formed by subjects with organizational, technical and IT skills.

The Privacy Team has the function of supporting the activity of the OWNER.

SUBJECTS AUTHORIZED FOR TREATMENT (pursuant to Article 29 of the GDPR)

The MOP provides that each employee / collaborator of the OWNER treats only the data necessary to perform their duties, depending on the internal organization and especially the purposes indicated and proposed to the interested party (so-called "limitation of purpose and data minimization", article 5 paragraph 1, letter b) and c) of the GDPR) A segmentation of the treatments has been prepared, for homogeneous areas of subjects authorized to treatment, binding the employees / collaborators in charge of each area to a specific area of Each authorized subject has received specific instructions from the OWNER regarding the processing of personal data. To this end, by design, the information system is also composed of "watertight compartments." The employee / collaborator can only access the data indispensable for carrying out their duties: designation to specific areas of processing takes place after careful analysis of the company structure and organization as well as the flow of internal and external data to the Company, and is summarized in a specific internal matrix that precisely identifies the area of treatment of each area.

The employee / collaborator has also received internal regulations on the use of IT tools and rules of conduct, including ethics, on all the information accessed by virtue of his specific task.

In order to effectively ensure compliance with the principles regarding the processing of personal data, the OWNER has also provided training and updating courses on the subject to its employees / collaborators who, by virtue of their duties, carry out processing of personal data.

SYSTEM ADMINISTRATORS (INTERNAL AND EXTERNAL)

The OWNER uses computer systems to manage and organize his business. For this reason, always, the attention to the construction of software, the methods of use and the security of data are the basis of the activity of the OWNER. Individuals with "manager" privileges within the company are specifically appointed and trained. The other specialized external companies that access company data are also specifically appointed External Managers and / or External System Administrators pursuant to art. 28 of the GDPR.

The suppliers of external IT services are chosen with particular attention to their professionalism, not only technical, but also in relation to the respect and protection of data, favouring certified companies.

RESPONSIBLE FOR TREATMENT (as per article 28 GDPR)

In principle the OWNER handles internally almost all processing activities. The cases of outsourcing to third parties of some activities that involve processing data on behalf of the OWNER are duly indicated in the individual information. In these cases the relationship with the third party is governed by a specific contract of appointment to "Data Processor" pursuant to art. 28 of the GDPR.

The OWNER entrusts this treatment activity to external parties who have sufficient guarantees to put in place suitable technical and organizational measures to meet the requirements of the GDPR and to guarantee the protection of the rights of those concerned.

1.2 RISK ANALYSIS AND MEASURES TO PREVENT PRIVACY RISKS

According to the principles of the c.d. "Accountability" (responsibility) is the responsibility of the OWNER to implement a series of measures - organizational, physical, legal, technical and informatics - aimed at preventing the risk of violation of the rights and personal liberties of those concerned. To achieve this goal a constant risk analysis is carried out, depending on the treatments, the tools used, the type and the amount of data processed.

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REGISTER OF TREATMENTS (as per article 30 GDPR) AND ANALYSIS OF THE DATA PROTECTION IMPACT (pursuant to Article 35 of the GDPR)

The MOP provides a careful and constant analysis of the risks for the processing of personal data, identified for each activity or service provided through a Register of Treatments pursuant to art. 30 paragraph 1 of the GDPR. Analysed the treatment activity carried out by the OWNER, it is believed that to date there are no activities at risk such as to require a specific impact assessment pursuant to art. 35 of the GDPR (c.d. "DPIA").

The analysis on IT risks and on the company's hardware and software infrastructures and on the IT adaptation measures was carried out both by our System Administrator with specific tools and check lists and by an external company specialized in IT security, which carried out an audit in-depth with safety tests. The results of the survey allowed the technicians to further improve their protection measures against cyber attacks and cyber threats, gradually and in proportion to the risk for the rights and freedoms of those concerned.

2 - TRANSPARENCY AND RIGHTS OF THE INTERESTED PARTY**2.1 RIGHTS ON THE PROTECTION OF PERSONAL DATA**

The OWNER, also here, considers it essential to inform interested parties of the existence of some rights regarding the protection of personal data, listed below.

- Right to be informed (transparency in data processing)

The interested party has the right to be informed on how the OWNER deals with your personal data, for what purposes and on other information foreseen by the art. 13 of the GDPR. To this end, the OWNER has set up organizational processes that allow, at the time of acquisition or request of personal data, the release of a model of information created "ad hoc" depending on the category of data subjects to which the data subject belongs (employee, customer, supplier etc.). This document allows to adequately inform all the subjects to whom the data refer to how the data is processed by the OWNER. The information model can be requested with a specific application addressed to the OWNER.

- Right of withdrawal of consent (Article 13)

You have the right to withdraw your consent at any time for all those treatments whose legitimacy is a manifestation of your consent. The withdrawal of consent does not affect the lawfulness of the previous treatment.

- Right of access to data (Article 15)

You can request a) the purposes of the processing; b) the categories of personal data in question; c) the recipients or categories of recipients to whom the personal data have been or will be communicated, in particular if recipients of third countries or international organizations; (d) where possible, the retention period of the personal data provided or, if not possible, the criteria used to determine this period; e) the existence of the right of the interested party to request the data controller to rectify or delete personal data or limit the processing of personal data concerning him or to oppose their treatment; f) the right to lodge a complaint with a supervisory authority; g) if the data are not collected from the data subject, all information available on their origin; (h) the existence of an automated decision-making process, including the profiling referred to in Article 22 (1) and (4) and, at least in such cases, significant information on the logic used, and the importance and expected consequences of such processing for the interested party. You have the right to request a copy of the personal data being processed.

- Right of rectification (Article 16)

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You have the right to request the correction of inaccurate personal data concerning yourself and to obtain the integration of incomplete personal data.

- Right to be forgotten (Article 17)

You have the right to obtain from the data controller the deletion of personal data concerning you if personal data are no longer necessary for the purposes for which they were collected or otherwise processed, if you revoke your consent, if there is no legitimate reason prevailing to proceed with the profiling treatment, if the data were unlawfully processed, if there is a legal obligation to delete it; if the data refer to web services rendered to minors without the relative consent. The cancellation can occur unless the right to freedom of expression and information prevails, whether they are kept for the fulfilment of a legal obligation or for the performance of a task carried out in the public interest or in the exercise of public powers, for reasons of public interest in the health sector, for purposes of archiving in the public interest, scientific or historical research or for statistical purposes or for the establishment, exercise or defence of a right in court.

- Right to limitation of treatment (Article 18)

You have the right to obtain from the data controller the limitation of processing when it has contested the accuracy of personal data (for the period necessary to the data controller to verify the accuracy of such personal data) or if the treatment is unlawful, but You are opposed to the deletion of personal data and asks instead that its use be limited or if they are necessary for the assessment, exercise or defence of a right in court, while the Holder is no longer necessary.

- Right to portability (Article 20)

You have the right to receive, in a structured, commonly used and automatically readable form, personal data concerning you and have the right to transmit them to another if the processing is based on consent, on the contract and if the processing is carried out by automated means, unless the processing is necessary for the performance of a task carried out in the public interest or in connection with the exercise of official authority and that such transmission does not infringe the rights of third parties.

- Opposition law (Article 21)

You have the right at any time to object, in whole or in part, to the processing of your personal data if the processing is carried out for the pursuit of a legitimate interest of the Owner or for purposes of direct marketing.

- Right to contact the Guarantor for the protection of personal data (Article 77).

Without prejudice to any other administrative or judicial appeal, if you consider that the processing that concerns you is in breach of the personal data protection regulation, you have the right to lodge a complaint with a supervisory authority, particularly in the Member State in which you are normally resident, work or the place where the alleged violation occurred.

2.2 EXERCISE OF RIGHTS

For the actual exercise of your rights you can ask the OWNER for information, or fill out the access forms that we provide you below.

2.3 MODULISTICS AND INFORMATION

1) Below is a draft document to be completed for the concrete exercise of the rights of the interested party. The form can be sent to the OWNER, to the addresses above, in accordance with current legislation.