

**INFORMATION TO BE PROVIDED TO THE DATA SUBJECT**  
**DATA COLLECTED FROM THE DATA SUBJECT**  
(pursuant to Article 13 of the GDPR 2016/679)

**PROCESSING: Customer management, accounting, sale of goods and / or provision of services,**

Dear data subject,

below we provide you with some information that you need to be aware of, not only to comply with legal obligations, but also because transparency and fairness towards the interested parties is a fundamental part of our business.

## DATA CONTROLLER

The Data Controllers of your personal data are responsible towards you for the legitimate and correct use of your personal data and may be contacted for any information or request; the names and contact details of the Data Controllers are as follows:

**Data controller: Friulpesca S.r.l.**

Headquarters: **VIA MARANO, 96 - 33050 CARLINO UD, IT**

Contact details:

Certified email	<a href="mailto:friulpesca@pec.it">friulpesca@pec.it</a>
E-mail	<a href="mailto:info@friulpesca.it">info@friulpesca.it</a>
Phone	0431 67921

## PURPOSE OF PROCESSING

The purposes and the legal basis of reference relating to the data that could possibly be collected and processed are as follows:

Purpose	Data processed	Legal basis
<b>PROCESSING: Customer management</b>		
The processing relates to the management of contracts with customers. The processing includes the registration of customers' personal data, the management of the customer database, the management / archiving of invoices issued to customers and the verification of the related collections, the management of communications to customers through the contact channels available (ordinary correspondence, and mail, telephone).		
Customer management; Monitoring of contractual obligations	Sex m/f; Tax code and other personal identification numbers; Name, address or other personally identifiable elements; Contact details (telephone number, e-mail, etc.); Bank account details; Province of residence; Declared profession	The processing is necessary for the execution of a contract in which the data subject is part of the execution of pre-contractual measures adopted upon request of the same - European Union standard (GDPR 2016/679); Member State rules eg. Civil Code regarding the provision of services
<b>PROCESSING: Accounting</b>		
The processing relates to the management of invoices related to sales and purchases. Management of relations with banking and insurance institutions. Management of petty cash book and cash, fixed assets in general, insurance, monthly balance sheets, motor vehicles, fuel expense sheets, treasury office. Management of the timing of payments to suppliers and collection from customers. Transmission of accounting documents to sector specialists such as accountants organized according to the forms provided for by law.		
Keeping of accounting records	Tax code and other personal identification numbers; Name, address and other personal identification elements; Economic, commercial, financial, insurance activities	The processing is necessary to fulfil a legal obligation of which the data controller is the subject - Rules of the Civil Code on the keeping of accounting records; Presidential Decree 600/1973
Tax obligations		The processing is necessary to fulfil a legal obligation of which the data controller is the subject - Rules of the Civil Code on tax obligations for S.r.l.; Consolidated Law on Income Tax.
<b>PROCESSING: Sale of goods and/or provision of services</b>		
The processing is related to the sale of goods and the provision of services to customers. More in detail, the processing is related to the activities communicated to the Chamber of Commerce, Industry, Crafts and Agriculture, and indicated also in the memorandum of association, with particular reference, among other things, to the wholesale and retail trade of fish products in general, to domestic trade and to import and export. For this purpose, the databases of active customers and, if available, the lists of potential customers are used. The latter, in particular, contain the contact details of potential customers not enrolled in the Public Opposition Register, and as such contactable by the staff assigned to the sales activity.		
Sales activities - wholesale and retail trade of fish products in general, domestic trade and import and export; fish storage and processing; Sales - retail trade of fish products [SHOPS]; Businesses: delicatessen laboratories, retail trade for foodstuffs, takeaway pizzerias, retail trade of soft drinks and beverages, catering with permit to serve	Common contact and customer data: Name, address or other personally identifiable elements; Contact details (telephone number, e-mail, etc.); Tax code and other personal identification numbers; Email address; Province of residence; Gender m/f	The processing is necessary for the execution of a contract in which the data subject is part of the execution of pre-contractual measures adopted upon request of the same - Rules of the Civil Code regarding the provision of services

Hotel hospitality business; administration of food and drinks [HOTEL JOLANDA]	Common contact and customer data: Name, address or other personally identifiable elements; Contact details (telephone number, e-mail, etc.); Tax code and other personal identification numbers; Email address; Province of residence; Gender m/f	The processing is necessary for the execution of a contract in which the data subject is part of the execution of pre-contractual measures adopted upon request of the same - Rules of the Civil Code regarding the provision of services
Marketing activities - Sending of newsletters [HOTEL JOLANDA]	Common contact and customer data: Name, address or other personally identifiable elements; Contact details (telephone number, e-mail, etc.); Tax code and other personal identification numbers; Email address; Province of residence; Gender m/f	The processing is necessary for the execution of a contract in which the data subject is part of the execution of pre-contractual measures adopted upon request of the same - Rules of the Civil Code regarding the provision of services; European Union Rule (GDPR 2016/679)
<p><b>Covid-19 Emergency - Green Pass</b></p> <p>The processing relates to the activities that are carried out by the company in order to counteract and contain the spread of the COVID-19 virus in the workplace, in relation to all production sectors. The company, in the execution of the Covid-19 anti-contagion measures, carries out the processing of personal data also relating to the health of the data subjects. There are different ways of acquiring such data. Among the main ones we mention the following: 1) scanning of the Green Pass-Green Certification of the data subjects using the VerificationC19 app or similar; 2) delivery, by the interested parties, of a declaration certifying they are not coming from areas at epidemiological risk and the absence of contacts, in the last 14 days, with subjects who tested positive for COVID-19; 3) detection of body temperature aimed at preventing access to the workplace if it exceeds a predetermined value; should it be necessary to document the reasons that prevented access to the company premises, it will be possible to identify the person concerned and record the exceeding of the temperature threshold. The data may be processed exclusively for the purpose of preventing contagion, with the specification that only the data necessary, adequate and relevant for this purpose will be collected. In the event of temporary isolation due to exceeding the temperature threshold, procedures to guarantee the confidentiality and dignity of the worker must be ensured and, in this case, the competent doctor must also be involved.</p>		
Prevention from COVID-19 contagion	Common data: contact and personal data (eg name, address or other elements of personal identification); Particular data present: data relating to health (eg current symptoms); the data acquired through the VerificationC19 app are: name, surname, date of birth and state of health (without the possibility of accessing other information e.g. whether the person concerned is vaccinated or not...)	The processing is necessary to fulfill a legal obligation to which the data controller is subject; the processing is necessary to fulfill a legal obligation to which the data controller is subject; the processing is necessary for reasons of public interest in the public health sector, such as protection from serious threats to health... omitted... - Regulation on prevention and containment of the spread of covid 19 (among many: Decree law 52/2021, D.L. 87/2021, D.L. 127/2021, L. 165/2021; D.L. 221/2021; D.L. 229/2021 and D.L. 1/2022)

## RECIPIENTS

Your data may be sent to the recipients or categories of recipients listed below:

### Categories of recipients

Individual or associated consultants and freelancers; Banks and credit institutions; Companies and enterprises (Companies operating in the field of logistics)

## DURATION OF THE PROCESSING

The duration of the processing is determined as follows:

The processing will take place when the data are collected from the data subject.

For the time necessary to fulfil the purposes indicated, and in any case not more than 10 years from the date of

termination of the contracts with the customers (art. 2220 of the Civil Code: retention of accounting records for 10 years; art. 22 of the Presidential Decree 600/1973; art. 2946 of the Civil Code: the rights expire due to prescription after 10 years) except for unsuccessful invitations to tender, for which 1 year is established.

## RIGHTS OF THE DATA SUBJECT

**In addition to the information reported above, to guarantee you the most correct and transparent processing of your data, you must be aware of the fact that:**

- you have the right to ask the data controller to access your personal data and to correct or cancel them or limit their processing or to oppose their processing;
- you have the right to receive the personal data concerning you provided to a data controller in a structured format, commonly used and readable by an automatic device. You have the right to transmit such data to another data controller without hindrance by the owner of the treatment that provided them if you comply with the conditions referred to in par. 1 art. 20 GDPR;
- if you have provided consent for one or more specific purposes, you have the right to withdraw this consent at any time;
- you have the right to lodge a complaint with the following Supervisory Authority: Data Protection Authority;

Moreover,

in relation to **Customer Management, Accounting and Covid Emergency-Green Pass** you have the legal obligation to provide your data, otherwise you will be subject to penalties as required by law

with regard to the processing of **Customer Management, Sale of goods and / or provision of services**, you have the contractual obligation to provide your data. The refusal to do this is to be considered a violation of the clauses contained therein, the knowledge of your personal data is a requirement necessary for the conclusion of the contract and it will not be possible to proceed with its stipulation in the absence of them