



Privacy Notice on the processing of personal data of customers

In compliance with the provisions of the Federal Data Protection Act (FADP), we provide you with the necessary information regarding the processing of personal data collected for the management of the contractual relationship with the customer (hereinafter also "You"). This notice is provided in accordance with the FADP.



1. DEFINITIONS

The personal data provided by you, or otherwise acquired in compliance with the legislative and contractual provisions in force, inherent to, connected with and/or instrumental to the relationship with you in existence, will form the object of processing, in compliance with the provisions of the FADP and the obligations of confidentiality. In particular:

Personal data: all information concerning an identified or identifiable natural person. By way of non-exhaustive example: personal data contained in the identity document, address, domicile, contact data such as e-mail and telephone.

Personal data worthy of special protection: - religious, philosophical, political or trade union opinions or activities; - health, intimate sphere or race affiliation; - social welfare measures; - administrative and criminal proceedings or sanctions.

The Data Controller may also become aware of data worthy of special protection suitable for detecting: data concerning criminal convictions and offenses, data concerning administrative and criminal prosecutions and sanctions. In particular, the extract of the criminal record.

Data subject: the private person whose personal data is being processed. In this specific case, the customer, the subject to whom the personal data relate.

Processing: any operation concerning data, regardless of the means and procedures used, namely the collection, storage, use, modification, communication, archiving or destruction of data.

Communication: the act of making data accessible, such as authorizing consultation, transmission or dissemination.



2. IDENTITY AND CONTACT DETAILS OF THE OWNER

The company that determines the purpose and means of the processing of personal data, in accordance with the FADP, is **Carugati SA**, a company under Swiss law with its registered office at Via G. Porta, 2 - 6830 - Chiasso, Switzerland, represented by the persons with signatory rights. The contact details of the data controller are as follows: info@carugatisped.ch

3. SCOPE OF THE PROCESSING / DATA RETENTION



SCOPE OF THE PROCESSING	DATA RETENTION
a) Management of the contractual relationship and related administrative accounting activities. Data are processed for the purpose of entering into and executing the contract as well as all related administrative accounting activities. In particular: - lease contract management; - performance filing; - bank report; - invoice issuance and invoice inventory management; - management of payment methods and terms; - issuance of numbered cards and goods handling (list of goods stored); management of export and import customs declarations; - inventory management for customs.	For the entire subsistence of the existing relationship and for 10 years following termination of the contractual relationship. Documents related to the management of customs and transportation files are deleted after 5 years.



b) Judicial and extrajudicial debt collection, management of any litigation.

Subsequent to the termination of the contractual relationship, data will be retained for 10 years. Documents related to customs and transportation management are deleted after 5 years. In case of litigation, data will be kept until the conclusion of the litigation.



4. TO WHOM WILL THE PERSONAL DATA COLLECTED BE COMMUNICATED?

The data of a personal nature provided will be communicated to recipients, who will process the data in their capacity as data processors for the purposes listed above or as data controllers. Precisely, the data will be disclosed to: -subjects that provide services for the management of the information system used by the Company and telecommunications networks (including e-mail), external suppliers in the field of information technology; - collaborators of the Company operating in different business functions and who will process the data in the performance of their duties according to the directives given by the company, for example: administration, accounting; - firms or companies within the scope of assistance and consulting relationships; - insurance companies; - employees/collaborators who, against specific written instructions, are authorized to view the images (live and/or recorded); competent authorities for fulfillment of obligations of laws and/or provisions of public bodies, upon request (ex. customs offices).



5. COMMUNICATION OF DATA ABROAD

Carugati SA informs the customer that in cases where the execution of the contract requires it, data will be transmitted to foreign authorities for the management of customs and goods flows. Pursuant to Art. 17 para. 1 (b) of the FADP, the data are communicated abroad because the communication is directly related to the execution of a contract between **Carugati SA**, the data controller, and the data subject, i.e. the customer.



6. RIGHTS OF THE DATA SUBJECT

According to the conditions established by the FADP, the Data Controller acknowledges the following rights to you as a Data Subject (non-exhaustive list):

- to obtain the rectification of inaccurate or obsolete personal data;
- to be informed in writing and free of charge if personal data concerning you are being processed;
- prevent the communication to third parties of sensitive personal data (if any);
- express your opinion on an automated individual decision or request that it be reviewed by a natural person (if any);
- to obtain the portability of personal data or to demand their transmission to a third party;
- to request the restriction or blocking of data processing, the prevention of data disclosure to third parties or rectification or destruction of personal data;
- the right to request that a given processing of personal data be prohibited, that a given communication of personal data to third parties be prohibited, or that certain personal data be deleted or destroyed;
- if neither the correctness nor the inaccuracy of the personal data can be proved, to request that a note be added to the data to indicate its disputed nature;
- to request that the rectification, destruction, blocking, in particular the communication to third parties, as well as the mention of the disputed character or the judgment be communicated to third parties or published;
- to have the unlawfulness of the processing of personal data declared.

You may exercise your rights under the FADP by contacting the Data Controller info@carugatisped.ch



7. ADDITIONAL INFORMATION | MODIFICATIONS | UPDATES

The Data Controller reserves the right to revise, update, add or remove any part of the present privacy policy at its own discretion and at any time. In case of modifications, the date of update will be indicated.

Date of last update: January 23, 2024