**PRIVACY POLICY**

Fores Engineering S.r.l., with registered office in Via Secondo Casadei, 12 –Forlì - 47122, Italy, tax code / VAT no. 02178650400, as the controller (“Fores Engineering” or the “Controller”), pursuant to Arts. 13-14 of Regulation (EU) 2016/679 (the General Data Protection Regulation, “GDPR”), is providing the following information on protection and security of personal data.

**1. Categories of personal data processed, purposes of processing and legal basis for processing.**

In the business relationships started with each Business Partner, Fores Engineering might process the following categories of personal data provided by its customers, by its suppliers and/or contractors, by its partners, or by its sales agents, brokers or consultants (each a “Business Partner”):

* Contact information, including, but not limited to: full name, work address, company telephone number, company mobile telephone number, company fax number, company e-mail address;
* Payment data, such as the data necessary for processing payments and preventing fraud, and other information associated with invoicing;
* Further information that needs to be processed as part of a project or a contractual relationship with Fores Engineering, or information volunteered by the Business Partners (including data on health, for example);
* Personal data collected from publicly accessible sources, databases and credit agencies; and
* Date of birth, identification numbers, identity cards and information on disputes or other legal proceedings against the Business Partners.

Fores Engineering might process the personal data for the following purposes:

* Communication with Business Partners relating to products, services and projects of Fores Engineering or its Business Partners;
* Signing contracts with the Business Partners, satisfying the obligations under said contracts and managing contractual relations with the Business Partner, such as the fulfilment of orders for products or services, processing of payments, accounting activities, reporting, collection and invoicing activities, management of shipments and deliveries, repairs and supply of services;
* Preventing and recognising security threats, fraud or other criminal or damaging activities;
* Guaranteeing compliance with regulations (such as export control regulations), carrying out “compliance” audits on the Business Partners (in order to prevent financial crimes and money laundering, for example) and guaranteeing compliance with the policies of Fores Engineering or with other applicable standards; and
* Settling disputes and exercising our rights under a contract, also in court.

The data is processed to satisfy the aforesaid purposes. Failure to provide the personal data may prevent the Controller and the Business Partner from entering into a contractual relationship.

Unless otherwise indicated, the legal basis for processing of the personal data is that:

* The Business Partner has given explicit consent to processing of the personal data (Article 6 (1) (a) General Data Protection Regulation);
* Processing is necessary for the performance of a contract to which the Business Partner is a party or in order to take steps prior to entering into a contract (Article 6 (1) (b) General Data Protection Regulation);
* Processing is necessary for compliance with a legal obligation to which the Controller is subject (Article 6 (1) (c) General Data Protection Regulation).
* Processing is necessary for the purposes of a legitimate interest pursued by the Controller, or to legally protect its rights under the contract (Article 6 (1) (f) General Data Protection Regulation).

**2. Transfer and disclosure of the personal data. Storage period.**

In order to pursue the aforesaid purposes, Fores Engineering might disclose the personal data received to the following recipients: (i) banks or financial institutions, (ii) law enforcement agencies, armed forces and other public administrations, to satisfy obligations laid down by law, by regulations or by EU regulations; (iii) companies, entities or associations, when disclosure of the personal data is necessary in order to enter into or fulfil a contract between the Controller and the Business Partner or in order to take steps prior to entering into a contract (including, but not limited to, the Controller’s customer and any subcontractors or suppliers of the Controller’s customer or of the Controller); (iv) competent insurance firms or insurance brokers; (v) companies specialised in the management of business or credit information; (vi) subsidiary, parent or associated companies.

The recipients of the personal data might be located in countries outside the European Economic Area (“third countries”), where the laws and regulations on personal data do not offer the same level of protection as the laws applicable in the countries of origin of the data. In these cases, the Controller will adopt all appropriate and necessary measures to guarantee a sufficient level of protection of the personal data in accordance with the provisions of this personal data processing policy. It is possible to contact the Controller to obtain a copy of this data and be made aware of the location where it is made available.

The data will be stored for a period not exceeding the time necessary for the purposes for which it has been collected or subsequently processed in accordance with legal obligations.

**3. Withdrawal of consent. Rights of the data subject.**

If the Business Partner gives consent to Fores Engineering for processing of specific personal data, it has the right to withdraw that consent at any moment (without affecting the lawfulness of processing based on consent before its withdrawal). If consent is withdrawn, Fores Engineering could continue processing the personal data if there are different legal grounds for this processing.

Under applicable legislation on protection of data, the Business Partner has the right to:

* obtain from the controller confirmation as to whether or not personal data concerning them is being processed, and, where that is the case, access to the personal data pursuant to Art. 15 GDPR;
* obtain from Fores Engineering the rectification of inaccurate personal data, pursuant to Art. 16 GDPR;
* obtain from Fores Engineering the erasure of the personal data provided, pursuant to Art. 17 GDPR;
* obtain from Fores Engineering the restriction of processing of the personal data provided, pursuant to Art. 18 GDPR;
* check the “data portability” of the personal data provided, pursuant to Art. 20 GDPR;
* Object to processing of the personal data provided pursuant to Art. 21 GDPR and/or lodge a complaint with the supervisory authority.

**4. Contacts.**

Fores Engineering provides support on any type of query, comment, problem or complaint relating to data privacy, or if you wish to exercise any one of your data privacy rights. You can contact us at: privacy@fores.it.