



General Statement

Reference legislation

From 25 May 2018 the European Regulation for the Protection of Personal Data of the EU 2016/679, (hereinafter GDPR), published in the European Official Journal on 4 May 2016 and having legal value for all European countries became operational. The GDPR establishes rules relating to the protection of natural persons with regard to the processing of personal data, as well as rules relating to the free movement of such data.

GDPR protects the fundamental rights and freedoms of individuals, in particular the right to the protection of personal data.

At the base of the new regulation is the principle of responsibility (Accountability) which informs the whole structure of the GDPR. The new regulation repeals Directive 95/46 / EC (general regulation on data protection).

TGM S.r.l implemented an organizational, technological and process model that satisfies the requirements of the GDPR, which is effective from that date. On the basis of these management systems, TGM S.r.l has put in place controls, procedures, information, and continuous improvement mechanisms designed to make the processing of personal data carried out by it and by any Data Processors that, in its name and on its behalf, should perform them, in line with the provisions of the European regulation.

TGM S.r.l promotes the respect, by its employees and collaborators, of high moral values and integrity of conduct, imposing the correct use of



the personal information of which they come into possession in carrying out their working activity.

Customer, Suppliers, Employees, of TGM S.r.l following their activities and their requests can provide personal data that are processed for the execution of related activities.

Il Controller is:

TGM S.r.l Strada Cappellette 3 Masio (AL)

TGM

Was founded in 1986 in the automotive sector as a producer of electrical wiring, on the entrepreneurial initiative of the Tasca brothers (hence the acronym of Tasca Giuseppe and Mauro), and thanks to their dynamism the company quickly reaches the figure of leader in sector, implementing its structure, which is having continuity with the second generation.

Over the years, T.G.M. has adapted to the needs of the market, gaining experience and expertise in various sectors and ranging over different products.

The central and administrative headquarters of the company is located in the municipality of Masio (AL) in a central and strategic area compared to large cities such as Milan, Turin, and Genoa.

TGM S.r.l carries out its activity in compliance with the principles of equality, impartiality, continuity, participation, efficiency, effectiveness and economy. It also undertakes to listen to the needs of institutions, companies and citizens, to confront them and to provide updated information on services and on virtuous environmental behaviour.



Our GDPR Compliance Officer can be contacted directly:

- privacy@tgmitalia.com

Definitions (Art. 4 GDPR)

- **'personal data'** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- **Special categories of personal data**: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership and the processing of genetic data, biometric data in order to uniquely identify an individual, data concerning health or data concerning the sexual life or sexual orientation of a natural person.
- **Controller**: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- **Data Subject**: any living natural person who is the subject of personal data held by an organization.



- **Processing:** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- **Lawfulness of processing (Art. 6 GDPR):** The treatments carried out by TGM S.r.l take place exclusively in compliance with the criteria of lawfulness contained in the GDPR (ex art.6) and in particular only with the consent of the interested party or for the execution of a contractual or legal obligation. For specific data, express consent will also be required in a clear and explicit manner.
- **consent of the data subject:** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;

In the case of children under the age of 16, the consent of the parental authority will be required (Art. 8).

Consent can be revoked at any time

- **Transfer of data to third parties:** TGM S.r.l will not transfer your personal data to third parties without having previously obtained your consent.



- **Retention period:** TGM S.r.l. will process the personal data according to the needs of the related processing indicated within the processing record and will store the personal data for the period specified and provide further information on how the period of storage has been defined.

- **Cookies**
No personal user data is acquired by the TGM S.r.l. site.
- - We do not use cookies to transmit information of a personal nature, nor are c.d. persistent cookies of any kind, or systems for tracking users.
- The use of c.d. Session cookies (which are not stored permanently on the user's computer and disappear when the browser is closed) are strictly limited to transmitting session identifiers (consisting of random numbers generated by the server) necessary to enable secure browsing and efficient site.
- I c.d. Session cookies used on this site avoid the use of other computer techniques that are potentially prejudicial to the privacy of users' browsing and do not allow the acquisition of personal identification data of the user.

Your Right as Data Subject

At any time, while we store or process your personal data, you, the data subject, have the following rights:

- **Right of access:** you have the right to request a copy of the information we hold about you.
- **Right of correction:** has the right to correct the data we hold about you that are inaccurate or incomplete.



- **Right to be forgotten:** In some circumstances, you can request that the data we keep about you be deleted from our archives.
- **Right to processing limitation:** when certain conditions apply to have the right to limit the treatment.
- **Right of portability:** you have the right to transfer the data in our possession to another organization as long as they are stored in digital format.
- **Right to object:** you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing,** including profiling
- **Right to appeal to the judicial authority:** if TGM S.r.l. refuses your request based on your access rights, we will provide you with the reasons. You will have the right to appeal, as described in the clause below, to the judicial authority.

1.1 Complaints

In the event you wish to file a complaint about how your personal data is processed by TGM S.r.l. (or by third parties as described in paragraph 3.4 above), or how your complaint was handled, you have the right to file a complaint directly to the supervisory authority and to the charge TGM S.r.l. Responsible for compliance with the GDPR.



Contact Details:

	Contact details of the Data Protection Officer	Contact details of the authority
Email:	privacy@tgm.com	garante@gpdp.it
Telephone:		

Privacy Statement

Personal Data

According to the EU's general data protection regulation (GDPR), personal data is defined as: "any information relating to an identified or identifiable natural person (" interested person); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or one or more factors specific to the appearance physical, physiological, genetic, mental, economic, cultural or social identity ".

How we use your information

This privacy statement tells you how, TGM S.r.l, will collect and use your personal data to outline additional information about services and activities that collect personal data, for example: cookies, profiling, complaints, etc.



Why does TGM S.r.l need to collect and store your personal data?

To enable us to provide you with a service, we need to collect personal data for the purpose of matching and / or providing detailed services. In any case, we are committed to ensuring that the information we collect and use is appropriate for this purpose and does not constitute an intrusion to your privacy. If contacted for marketing purposes; TGM S.r.l will consult you for further consent

Will TGM S.r.l communicate my personal data to others?

We may transmit your personal data to third-party service providers on behalf of the company during the relationship (data processors). Any third parties with whom we may share your data are obliged to store them securely and use them only to satisfy the service they provide on our behalf. When they no longer need their data to satisfy this service, they will delete them in line with TGM S.r.l. If we need to transfer your sensitive personal data to third parties, we will do so only after obtaining your consent, unless we are legally required to do otherwise.

How does TGM S.r.l use my personal data?

TGM S.r.l will process (collect, store and use) the information provided in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will do our best to keep your information accurate and up to date and not to keep it for longer than necessary. TGM S.r.l is required to keep the information in



accordance with the law, such as information necessary for income tax and for investigations.

The duration of the retention of certain types of personal data may also be governed by specific requirements of the business sector or by concerted practices. Personal data may be kept in addition to these periods depending on specific business needs.

In what circumstances will TGM S.r.l contact me?

Our goal is not to be intrusive and we are committed to not asking irrelevant or useless questions. Furthermore, the information provided will be subject to strict measures and procedures to minimize the risk of unauthorized access or disclosure.

Can I access the personal data that the organization holds about me?

TGM S.r.l at your request can confirm what information it keeps about you and how it is processed.

If TGM S.r.l holds personal data about you, you can request the following information:

- Identity and contact details of the person or organization that determined how and why to process the data.
- Contact details of the data protection officer, if applicable.
- The purpose of the processing and the legal basis for processing.
- If the treatment is based on the legitimate interests of TGM S.r.l or a third party, information concerning these interests.
- The categories of personal data collected, stored and processed.



- Recipients or categories of recipients to whom the data may or may be communicated.
- If we intend to transfer personal data to a third country or an international organization, information on how we guarantee it this will be done safely. EU approved sending personal data to some countries because they meet a minimum data protection standard. In other cases, we will make sure that specific measures are in place to protect your information.
- How long your data will be retained.
- Details of your rights to correct, delete, restrict or oppose such processing.
- Information on your right to withdraw consent at any time.
- How to file a complaint with the supervisory authority.
- If the provision of personal data is a legal or contractual requirement, or a necessary requirement to enter into a contract, as well as if you are obliged to provide personal data and the possible consequences of not providing such data.
- The source of personal data if it was not collected directly from you.
- All the details and information of the automatic decision-making process, such as profiling, and any significant information on the logic involved, as well as the intended meaning and consequences of such processing.



Which identity documents will I have to provide to access this service?

TGM S.r.l accepts the following documents when information on your personal data is requested: Identity Card Passport, Driving License

To exercise the right of access, you can use the "access to data" form, which can be downloaded at the address:

www.tgmitalia.com/privacy

How can I withdraw my consent to the processing of my personal data?

To exercise the right of access, you can use the "data revocation" form prepared, downloadable at the address:

www.tgmitalia.com/privacy