



CIRCULAR LETTER ON "PRIVACY"

PURSUANT TO ART. 13 OF THE EUROPEAN REGULATION No. 679/2016 (GDPR)

Dear Sir/Mme,

In compliance with the obligations provided by the European Regulation No. 2016/679 (GDPR), we would like to inform you that:

The Data Controller is the company, 4 FLYING S.R.L., with registered office in Viale Edison, 6, 37059, Campagnola di Zevio (VR), VAT code 03744120233 Certified e-mail: amministrazione@pec.4-flying.com; the DATA PROTECTION OFFICER can be contacted at the following address: infoprivacy@4-flying.com.

1. Subject matter and Objectives of the processing: your identification and financial data needed to fulfil the contractual relationship, and which will be processed for the following objectives:
 - a) To establish and carry out contractual relationship with the company, subsequent changes or variations and for any obligation provided for the same purpose.
 - b) To monitor the provision of products/services, the progress of relationships with the clients and suppliers and for risk management analysis in relation to contractual relationships.
 - c) To fulfil any type of obligation provided by community laws, regulations or norms.
 - d) To contact you for the purpose of providing the service and contract fulfilment.

The lawful basis for the processing is the execution of a contract and fulfilment of law obligations (taxes, obligatory and insurance entries, etc.).

2. Processing methods. Data processing will be performed for the objectives referred to in point 2 in compliance with privacy norms in force, based on the principles of adequacy, legitimacy and transparency, and performed in a specific, explicit and limited manner with or without the use of electronic, IT or telematics means.

The processing may consist in the following operations: collection, registration, organization and storage, consultation and use, elaboration, modification, selection, extraction, comparison, interconnection, transmission and communication, cancellation and destruction, and blockage and limitation.

The processing will be performed by the Data Controller, Data Processors assigned and/or persons specifically authorized and instructed by the Controller for the correct processing of data.

3. Refusal to communicate the data and obligatory communications. The communication of your personal data is optional but necessary for the purpose of carrying out the relationship obligations in a correct manner.

Though legitimate, your refusal to communicate your personal data shall imply the impossibility to carry out our activities as referred to in point 2 and to establish or continue the relationship. We are informing you that once the relationship has been established, the Controller's communication of data to the data subjects as per point 5 is obligatory, and will not require your consent for the fulfilment of community laws, regulations and norms.

4. Communication of data and access. If requested, your personal, identification, sensitive and judicial data may be acquired by the Controller, and the subjects authorized to do the processing, who are appointed by the Controller. Moreover, they may be communicated, for the objectives referred to in point 2, to external collaborators and Data Processors (Consultants and professionals for the management of tax, accounting, social security and contribution obligations, System Administrators, Public Entities, Police Forces, Judicial or Administrative that provide functional services for the given objectives).
5. Storage: The personal data for identification (name, surname, e-mail address, etc.) shall be collected and registered for the sole objective referred to in point 2) and will be kept for such objective for the entire duration of the contractual relationship and subsequently for 10 years, or however, for the time provided by Italian and Community norms to fulfil tax or other law obligations.

6. The company uses the managerial KPI Software Inc. that may retain the data also in servers located in the U.S.A; such software however complies with European norms on matters of privacy, guarantees the security of data processed, and is a member of the Privacy Shield.

The data are not subject to diffusion.

7. Rights of the data subject. The GDPR confers on the data subject, the exercise of specific rights which may be exercised with regard to the Controller:

- Request access to your personal data and information regarding yourself; rectification of inexact data or completion of incomplete ones; erasure of personal data that regard yourself (upon occurrence of one of the conditions indicated in Art. 17, paragraph 1 of the GDPR and in compliance with the exceptions provided in paragraph 3 of the same article); limitation of the processing of your personal data (on the occurrence of one of the situations indicated in Art. 18, paragraph 1 of the GDPR) and request the updated list of the Data Processors and System Administrators;

- obtain – in the assumption that the lawful basis of processing is used, both the contract, performed with automatized means – and your personal data in a structured format and electronically readable, also for the purpose of communication of such to another Data Controller (so-called portability of personal data), oppose at any time, the processing of your personal data when particular situations occur to you;

- revoke your consent any time, limitedly to the hypotheses wherein the processing is based on your consent for one or more specific objectives. The processing based on your consent prior to the revocation of the same, however retains its lawful basis;

- lodge complaints to the Supervisory Authority (www.garanteprivacy.it).

Your requests may be sent to the Data Controller in the following ways:

- registered letter and return slip to: 4 FLYING S.R.L., Viale Edison, 6, 37059, Campagnola di Zevio (VR),
- Certified e-mail: amministrazione@pec.4-flying.com,
- The Data Protection Officer can be contacted at the following address: infoprivacy@4-flying.com.

Verona, date _____

Signature of the data subject who has read the terms and authorized the processing _____