



## Rotating Global Service S.r.l.

### Headquarter

Loc. Piantata, 30  
01020 Proceno - Viterbo, Italy  
[info@rotatingglobalservice.com](mailto:info@rotatingglobalservice.com)  
[www.rotatingglobalservice.com](http://www.rotatingglobalservice.com)

### Operational Office

Via Francesco Cilea, 11/13  
50041 Calenzano, (FI) Italy  
[info@rotatingglobalservice.com](mailto:info@rotatingglobalservice.com)  
[www.rotatingglobalservice.com](http://www.rotatingglobalservice.com)

Subject: Information to the interested party in relation to the processing of personal data in accordance with the European Data Protection Regulation 2016/679.

Dear Customer,

We wish to inform you that Article 13 of EU Regulation 2016/679 provides for the protection of persons and other subjects regarding the processing of personal data. ROTATING GLOBAL SERVICE SRL – LOC. PIANTATA 30 – 01020 PROCENO VT – ITALY - CF and VAT number 04314560758 (hereinafter "Holder"), in its capacity as data controller, informs you pursuant to art. 13 EU Regulation n. 2016/679 (hereinafter, "GDPR") that your data will be processed in the manner and for the following purposes:

#### 1. Object of the Treatment

The Data Controller processes personal, identifying and non-sensitive data (in particular, name, surname, company name, address, telephone, e-mail, bank and payment details) - hereinafter, "personal data" or even "data") by you / you communicated on the conclusion of contracts for the services of the Owner.

#### 2. Purpose of the processing

Your personal data are processed:

A) without your express consent art. 6 lett. b), e) GDPR), for the following Service Purposes: • Conclude the contracts for the services of the Owner;

- Fulfil the pre-contractual, contractual and tax obligations deriving from relations with you in existence;
- Management of administration, accounting, orders, shipments, invoicing, services
- To fulfil the obligations established by the law, by a regulation, by the community legislation or by an order of the Authority (such as in the matter of anti-money laundering);
- Exercise the rights of the owner, for example the right to defense in court;

B) Only subject to your specific and distinct consent (Article 7 GDPR), for the following Marketing Purposes:



ISO 9001:2015 –cert n. IT309282



## Rotating Global Service S.r.l.

- Send them via e-mail, mail and / or text messages and / or telephone contacts, newsletters, commercial communications and / or material advertising on products or services offered by the Owner and recognition of the degree of satisfaction with the quality of services;
- Send them via e-mail, mail and / or SMS and / or Telephone contacts commercial and / or promotional communications of third parties (for example, business partners, insurance companies, etc.)

Please note that if you are already a customer, we may send you commercial communications relating to services and products of the Owner similar to those you have already used, subject to your disagreement (Article 130 paragraph 4 of the Privacy Code). It is also specified that the minimum age for access to services is 16 years, in accordance with art. 8 paragraph 1 of the GDPR.

3. Processing methods the processing of your personal data is carried out by means of the operations indicated in art. 4 of the Privacy Code and art. 4. 2) GDPR and more precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your personal data are subjected to both paper and electronic and / or automated processing.

The Data Controller will process the personal data for the time necessary to fulfil the aforementioned purposes and in any case for no more than 10 years from the termination of the Service Finality relationship and no later than 2 years from the collection of data for the Marketing Purposes.

#### 4. Access to data

Your data may be made accessible for the purposes referred to in art. 2.A) and 2.B):

- To the employees and collaborators of the Data Controller, in their capacity as persons in charge and / or internal managers of the processing and / or system administrators;
- To companies / professional firms that provide assistance, advice or legal, tax and financial, to public administrations, credit institutions, for the performance of institutional functions within the limits established by law or regulations and to third party service providers whom is necessary for the performance of the services covered by the contract.
- Your data may also be processed, on behalf of the Customer, by professionals and / or companies responsible for carrying out technical, development, management and administrative-accounting activities.

#### 5. Communication of data

Without the need for express consent (Article 6 letter b) and c) GDPR), the Data Controller may communicate your data for the purposes referred to in art. 2.A). Without prejudice to communications and disclosures made in implementation of legal obligations, the data relating to your Person may be communicated in Italy and / or abroad to:

- Professionals and consultants, consultancy companies, factoring companies, credit institutes, debt collection companies, credit insurance companies, commercial information companies, companies operating in the transport sector; Public and private bodies, also following inspections or audits such as, for example: Financial Administration, Tax Police, Judicial Authorities, Italian Exchange Office, Labour Inspectorate, Local Health Authority, Social Security Agencies, Chamber of Commerce, etc .; Your information will not be disseminated.



ISO 9001:2015 –cert n. IT309282



## Rotating Global Service S.r.l.

### 6. Data transfer

Personal data are stored on servers located in ITALY, within the European Union. In any case, it is understood that the Data Controller, if necessary, will have the right to move the servers even outside the EU. In this case, the Data Controller hereby ensures that the transfer of non-EU data will take place in accordance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided by the European Commission. The owner reserves the possibility to use services in the cloud and in this case the service providers will be selected among those who provide adequate guarantees, as required by art.46 GDPR 2016/679

### 7. Nature of the provision of data and consequences of refusal to reply

The provision of data for the purposes referred to in art. 2.A) is mandatory. In their absence, we can not guarantee the services of the art. 2.A). The provision of data for the purposes referred to in art. 2.B) is optional. You can therefore decide not to give any data or to subsequently deny the possibility of processing data already provided: in this case, you will not be able to receive newsletters, commercial communications and advertising material concerning the Services offered by the Data Controller. However, you will continue to be entitled to the Services referred to in art. 2.A).

### 8. Rights of the interested party

In your capacity as an interested party, you have the rights set forth in art. 7 of the Privacy Code and art. 15 GDPR and precisely the rights of:

A. To obtain confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;

B. To obtain the indication:

- a) of the origin of personal data;
- b) of the purposes and methods of the processing;
- c) of the logic applied in case of treatment carried out with the aid of electronic instruments; d) of the identification details of the owner, the managers and the designated representative pursuant to art. 3, paragraph 1, GDPR; e) of the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the territory of the State, managers or agents

C. To obtain:

- a) updating, rectification or, when interested, integration of data;
- b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case where such fulfilment is it proves impossible or involves a use of means manifestly disproportionate to the protected right

D. Oppose, in whole or in part:

- a) for legitimate reasons to the processing of personal data concerning you, even if pertinent to the purpose of collection;



ISO 9001:2015 –cert n. IT309282



## Rotating Global Service S.r.l.

b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and / or through traditional marketing methods by telephone and / or paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the data subject to exercise the right to object even only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or none of the two types of communication. Where applicable, it also has the rights referred to in Articles 16-21 GDPR (Right of rectification, right to be forgotten, right of limitation of treatment, right to data portability, right of opposition), as well as the right of complaint to the Guarantor Authority.

### 9. How to exercise rights

You can exercise your rights at any time by sending a registered letter A.R. a: ROTATING GLOBAL SERVICE SRL with registered office at LOC. PIANTATA 30 – 01020 PROCENO – VT ITALY and / or a pec at: [rotatingservice@legalmail.it](mailto:rotatingservice@legalmail.it)

### 10. Minors

The Services and the Website of the Data Controller are not intended for minors under the age of 18 and the Data Controller does not intentionally collect personal information about minors. In the event that information on minors were unintentionally registered, the Data Controller will delete them in a timely manner, at the request of users.

### 11. Owner

The manager and agents The Data Controller is ROTATING GLOBAL SERVICE SRL with registered office at LOC. PIANTATA 30 – 01020 PROCENO – VT- ITALY The updated list of data processors and data processors is kept at the administrative headquarters of the Data Controller

Proceno, .....

**ROTATING GLOBAL SERVICE S.R.L.**  
**CLAUDIO NOCENTINI**  
**PRESIDENT & CEO**



ISO 9001:2015 –cert n. IT309282



## Rotating Global Service S.r.l.

The Data Controller Consent to the processing of data The company / Mr. ....  
..... with registered office / resident in ..... Street  
..... n ° ..... having read the above information, express their consent to have  
their personal data processed, in compliance of the aforementioned European Regulations, for the purposes  
indicated, and so that they can be communicated to subjects for the stated purposes.

Date

Stamp / Signature

Privacy Information Rev. 0 dated 11/11/21



ISO 9001:2015 –cert n. IT309282