







PRIVACY NOTICE - FOR CLIENTS

Information notice pursuant to and for the purposes of Article 13 of Regulation (EU) 2016/679 (GDPR)

	<p>1. WHO IS THE DATA CONTROLLER? CONTACT DETAILS The Data Controller is SARO S.R.L., with operational headquarters at Via G. di Vittorio no. 5, 20020 Arconate (MI), represented by its Legal Representative pro tempore, whom you may contact for any information by telephone at +39 0331 453794 or by email at privacy@sa.ro.it</p>
	<p>2. MAIN DEFINITIONS Please note that Article 4 of the GDPR provides the following definitions: Personal data: 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.</p>

3. PURPOSES OF PROCESSING, LEGAL BASIS, RETENTION PERIOD, NATURE OF DATA PROVISION

	 PURPOSES OF PROCESSING	 LEGAL BASIS	 RETENTION PERIOD	 NATURE OF DATA PROVISION
A)	<p>Performance of contractual obligations and administrative-accounting and legal purposes related to the establishment, execution and termination of the contractual relationship.</p>	<p>Data processing is necessary for the performance of a contract (C44). Article 6(1)(b) of the GDPR.</p>	<p>10 years. Article 2220 of the Italian Civil Code, without prejudice to any contractual or non-contractual matters that may arise and to any different legal obligations.</p>	<p>The provision of personal data is necessary for contractual purposes. Failure to provide the necessary personal data will make it impossible to establish a contractual relationship with the data subjects.</p>
B)	<p>Management and handling of disputes and other legal matters, as well as defence in legal proceedings.</p>	<p>The processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by third parties, provided that such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data (C47-C50). Article 6(1)(f) of the GDPR</p>	<p>10 years, unless an objection is lodged, and in any case for the time necessary to defend rights in legal proceedings.</p>	<p>The provision of data is necessary. Failure to provide the data will prevent the achievement of the Data Controller’s legitimate interest indicated in the purposes set out in this point. Any refusal must be balanced against the Data Controller’s legitimate interest indicated in the purposes set out in this point.</p>
C)	<p>Management of requests concerning personal data protection and requests from other data subjects, pursuant to Articles 15 et seq. of the GDPR (data subject rights).</p>	<p>The processing is necessary for compliance with a legal obligation to which the Data Controller is subject (C45). Article 6(1)(c) of the GDPR.</p>	<p>5 years from closure of the request, unless litigation arises.</p>	<p>The provision of personal data is mandatory, as it is essential in order to comply with legal obligations.</p>

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	 PURPOSES OF PROCESSING	 LEGAL BASIS	 RETENTION PERIOD	 NATURE OF DATA PROVISION
D)	<p>Management control aimed at guiding management towards the achievement of the objectives established during operational planning, by measuring specific indicators to detect any deviation between planned objectives and results achieved, and informing the responsible bodies of such deviations so that they may decide on and implement the appropriate corrective actions.</p>	<p>The processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by third parties, provided that such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data (C47-C50). Article 6(1)(f) of the GDPR</p>	<p>Maximum 10 years, unless an objection is lodged.</p>	<p>The provision of data is necessary to enable the Data Controller to carry out management control activities. Failure to provide the data will prevent the achievement of the Data Controller's legitimate interest indicated in the purposes set out in this point. Any refusal must be balanced against the Data Controller's legitimate interest indicated in the purposes set out in this point.</p>
E)	<p>Management of contracts subject to the Public Procurement Code. The provisions of the Public Procurement Code also apply to private entities where there is a public interest in the execution of the work or service, involving the processing of any data relating to criminal convictions and offences or related security measures (see below).</p>	<p>Data processing is necessary for the performance of a contract (C44). Article 6(1)(b) of the GDPR.</p>	<p>Retention for a maximum of 2 years.</p>	<p>The provision of personal data is necessary for contractual purposes. Failure to provide the necessary personal data will make it impossible to award you the assignment.</p>
F)	<p>Within the context of contract management, for the specific purposes provided for by Union or Member State law, the Data Controller will process personal data capable of revealing measures referred to in Article 3, paragraph 1, letters a) to o) and r) to u), of Italian Presidential Decree no. 313 of 14 November 2002, concerning the criminal records register, the register of administrative sanctions resulting from criminal offences and the related pending charges, or the status of defendant or person under investigation pursuant to Articles 60 and 61 of the Italian Code of Criminal Procedure.</p>	<p>The processing is necessary for compliance with a legal obligation to which the Data Controller is subject. Article 6(1)(c) of the GDPR. Public Procurement Code – Legislative Decree no. 36 of 31 March 2023. Public Contracts Code implementing Article 1 of Law no. 78 of 21 June 2022, delegating the Government on public contracts. See Article 94, “Automatic grounds for exclusion”, et seq</p>	<p>Retention for a maximum of 24 months from the end of the assignment, without prejudice to the need for further retention for the purposes of judicial protection of rights [web document no. 9682603].</p>	<p>The provision of personal data is mandatory, as it is essential in order to comply with legal obligations.</p>

	<p>4. TO WHOM WILL THE PERSONAL DATA BE DISCLOSED? DATA RECIPIENTS</p> <p>The data will not be disseminated. Personal data will be disclosed to entities that will process the data as independent Data Controllers or as Data Processors (Article 28 GDPR), and processed by natural persons (Article 29 GDPR) acting under the authority of the Data Controller and the Processors, on the basis of specific instructions provided regarding the purposes and methods of processing.</p> <p>The data will be disclosed to recipients belonging to the following categories: entities based in Italy that manage/support/assist, even occasionally, the Data Controller in the administration of the Information System and telecommunications networks, including email, websites and/or web platforms; entities based in Italy identified by current accounting and tax legislation as recipients of mandatory communications; banks and equivalent institutions based in Italy; entities based in Italy with which the Data Controller has entered into economic agreements; firms or companies based in Italy providing tax assistance and consultancy and administrative/accounting management services; certification bodies and companies based in Italy; any clients based in Italy, in EEA countries or outside the EEA; competent Authorities for compliance with legal obligations and/or provisions issued by public bodies, upon request.</p> <p>The list of Data Processors pursuant to Article 28 is available by writing to privacy@sa.ro.it or to the other contact details indicated above.</p>
	<p>5. IS THERE ANY DATA TRANSFER TO A NON-EEA COUNTRY?</p> <p>Personal data will not be transferred to non-EEA countries. In particular, please note that the data will be stored in Italy and that the data recipients are based in Italy.</p>
	<p>6. VI È UN PROCESSO AUTOMATIZZATO?</p> <p>Personal data will be processed using traditional manual, electronic and automated means. Please note that no fully automated decision-making processes are carried out.</p>
	<p>7. RIGHTS OF DATA SUBJECTS</p> <p>Data subjects may exercise their rights as set out in Articles 15 et seq. of the GDPR by contacting the Data Controller at the email address privacy@sa.ro.it, or by writing to the contact details indicated above.</p> <p>The Data Controller guarantees data subjects the right to request, at any time, access to their personal data (Article 15), rectification (Article 16), erasure (Article 17), and restriction of processing (Article 18). The Data Controller shall notify (Article 19) each recipient to whom the personal data have been disclosed of any rectification, erasure or restriction of processing carried out. The Data Controller shall inform data subjects of such recipients upon request. The Data Controller guarantees the right to data portability (Article 20) and, in the event of requests pursuant to Article 20, shall provide data subjects with their data in a structured, commonly used and machine-readable format. Data subjects have the right to object (Article 21), at any time, to the processing of data based on legitimate interest, by writing to the contact details indicated above with the subject line “objection”. In the event of the exercise of the right to object to processing based on legitimate interest, the Data Controller allows data subjects, upon request, to obtain information on the balancing test carried out.</p> <p>Where data subjects consider that the processing of personal data carried out by the Data Controller infringes Regulation (EU) 2016/679, they are free to lodge a complaint with the national supervisory authority, in particular in the Member State of their habitual residence, place of work, or place where the alleged infringement of the Regulation occurred — the Italian Data Protection Authority, https://www.garanteprivacy.it/ — or to seek a judicial remedy before the competent courts.</p>
	<p>8. CHANGES TO THE PRIVACY NOTICE</p> <p>The Data Controller may change, amend, add to or remove any part of this Privacy Notice. In order to facilitate the verification of any changes, the Privacy Notice will indicate the date on which it was last updated.</p>

Date of last update: 12/05/2026

**Data Controller
SARO S.R.L.**

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