



information on the processing of personal data by recording telephone calls

In accordance with Regulation (EU) 2016/679 on the protection of personal data (hereinafter the "Regulation"), the interested parties are provided with information on the processing of their personal data, which will be carried out in compliance with the principles of correctness, lawfulness, transparency and protection of personal rights, in accordance with the legislative provisions of the current legislation and the confidentiality obligations provided for.

Data Controllers and Processors

Thermomat Srl, registered office Via M. Curie 7, 46034 Borgo Virgilio (MN), in the person of the pro-tempore legal representative;

Thermomat Saniline Srl, registered office Via M. Curie 7, 46034 Borgo Virgilio (MN), in the person of the pro-tempore legal representative;

By specific agreement, both companies are joint controllers of the treatment pursuant to art. 26 of the GDPR (hereinafter jointly referred to as "Owner"), as regards the processing of data carried out by recording telephone calls since they share the aims and methods, jointly and severally answer the phases of collection and subsequent use of personal data and jointly determine how the data will be stored and who will have access to the information collected. With regard to the management of audio recording data, the company Thermomat Saniline Srl is appointed as data processor, which, for the common purposes indicated, is called to manage the registration, organization, storage, consultation and cancellation phases.

Categories of interested parties

Company staff Thermomat Srl and Thermomat Saniline Srl; third persons who make telephone calls to our office in Borgo Virgilio

Nature of the processed data and purpose of processing

The processing, or the recording of phone calls arriving at our Borgo Virgilio office, is carried out for the following purposes:

- verify the adequacy of the service with the required quality standards;
- better manage the training of company personnel for telephone communication;
- manage any complaints or disputes with third parties.

The data are used for "sample" listening on the quality of phone calls, or during specific training interventions for improving corporate communication.

The Owner states that incoming telephone calls will be recorded exclusively for the aforementioned purposes; any interest in collecting and / or recording particular or judicial data is excluded, therefore we invite you not to provide this information during phone calls with our staff.

Legal basis of processing and optional conferment

At the beginning of the call, the automatic responder notifies the user in advance about the registration by a brief information note in audio format, which expressly refers to this detailed information text published on the website of the Data Controller under the heading "Privacy". The person is invited, in case of refusal of registration, to close the call and contact us in another way, for example by e-mail.

The provision of data, based on the legitimate interest of the Data Controller, is optional and does not in any way affect the relationship with the interested party. The Customer has the right

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to communicate or not further personal data during the conversation, however the lack of such consent could prevent the Owner from following up the requests of the subject.

Methods of treatment and conservation

The data of the audio recordings are stored on the company computer system, protected with the appropriate security measures designed to ensure the confidentiality of the customer and make them accessible only to designated employees: the Owner and the Manager have appointed the authorized persons to access the records, export them, delete them. Please note that the data is not disclosed to third parties.

The data is stored for a period of sixty days from collection, then automatically deleted by the system.

Data dissemination and transfer

The data will not be disseminated in any way and will not be transferred outside Europe.

Exercise of the rights of the interested party

This information was disclosed to the company personnel, the other interested parties who are active in the phone calls can consult this text on the company websites under the heading "Privacy".

Except for the limitations provided for by the same Regulation, the interested party may, at any time, exercise the following rights provided for in articles 15 to 22 of the GDPR:

- Access to personal data; rectification; cancellation; limitation of the treatment; opposition to treatment; data portability
- revocation of consent, where envisaged: the withdrawal of consent does not affect the lawfulness of the processing based on the consent given before the revocation;

To exercise their rights, the data subject must contact the Data Controller at one of the companies: Thermomat Srl - Via M. Curie 7, 46034 Borgo Virgilio (MN) Italy - info@thermomat.com Thermomat Saniline Srl - Via M. Curie 7, 46034 Borgo Virgilio (MN) - info@everlifedesign.it

The interested party may also make a complaint, in the terms and manner provided, with the Authority for Privacy: it is advisable to consult www.garanteprivacy.it for more information.

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