Privacy Statement to Clients

TROCELLEN GmbH, as data controller (hereinafter, "Data Controller"), informs you pursuant EU Regulation no. 679/2016 ("GDPR") and the applicable national legislation on Data Protection, that your personal data shall be processed according to the following modalities and for the following purposes:

1. Object of the Processing

The Data Controller processes identifying - non-sensitive - personal data (hereinafter "Data" or "Personal Data") (particularly, name, surname, ID, tax code, address, email, phone number, etc.), communicated by you during the signing of the contract with the Data Controller or request for services and products of the Data Controller, or even later.

2. Purposes of Data Processing

Your Personal Data are processed without your prior consent for the following purposes:

A. without your prior consent, for Contractual Purposes:
- Conclude, execute and manage the contract, providing the services of the deriving from the commercial offer of the Data Controller and manage technical assistance, billing services, complaints and any disputes, sending service messages, data recovery, prevention of frauds and/or illegal activities;
- Manage a contact request from you;
- Exercise the rights of the Data Controller, such as the right to defence in court;
- The compliance with obligations established by laws, regulations or by EU legislation or imposed by the Authorities.

B. only prior your consent, for Marketing Purpose and, precisely, to:
- Inform you by means of regular letters or phone calls, emails, newsletter of the initiatives and commercial offers of the Data Controller. Moreover, if it is already our client, we might send you commercial communications to the email address you provided us, relating product and services of the Data Controller, which you have already used. Every sent email will allow you, by clicking on the specific link, to refuse further communications.

3. Modalities of Data Processing

The processing of your Data is carried out, both according to hard paper and electronic modalities, by means of data collection, registration, organization, storage, consultation, elaboration, amendment, selection, mining, confrontation, usage, interconnection, blockage, communication, cancellation and destruction operations.

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4. Data Storage

The Data Controller shall process the Personal Data for the time necessary to fulfil the above purposes and anyway for no longer than 10 years after the end of the contractual relationship and for no longer than 2 years since the collection for Marketing Purposes.

5. Access to Data

Your Data may be made accessible for the purposes mentioned above to:

- employees and/or collaborators of the Data Controller, in light of their role of persons in charge of the processing and/or internal Data Processors and/or system administrators;
- third companies or other subjects (e.g., IT service providers, providers, credit institutes, professional firms, etc.) carrying out outsourcing activities on behalf of the Data Controller and processing Data as external Data Processors.

6. Data Communication

Your Data may be communicated, even without your prior consent, upon their request, to control bodies, police or judiciary bodies, Budgetary Ministry, Tax Authority, ministerial bodies and competent Authorities, Local Institutions (Regions, Provinces, Municipalities), Regional and Provincial Tax Commissions, that will process them in their quality of independent Data Controllers for institutional purposes and/or pursuant to the law during investigations and controls. Moreover, your Data may be communicated to third subjects (for example, partners, independent contractors, agents, etc.) that will process them as independent Data Controllers to carry out activities that are instrumental to the above purposes.

7. Data Transfer

Your Data shall not be disseminated and transferred to extra EU countries.

8. Nature of the Data provision and consequences of a refusal to answer

The provision of Data is mandatory for Contractual Purposes: these Data are necessary to benefit of the services of the Data Controller and should you decide not to provide your Data, you will not be able to benefit of the services of the Data Controller. The provision of Data for Marketing Purposes is voluntary and should you decide not to provide your Data, you will not be hindered in the use of such services of the Data Controller. If you decide not to provide your Data, however, you will not be able to receive our commercial communications any longer.

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9. Data Subjects' Rights

The Data Controller informs you that, in your quality of Data Subject, you have the rights to:

- obtain confirmation over the existence or inexistence of Personal Data relating you, even if not yet registered, and their communication in a comprehensible way;
- obtain the indication and, if necessary, the copy of the: a) source and category of the Personal Data; b) logic applied in case the processing is performed by means of electronic instruments; c) purposes and modalities of the processing; d) identification references of the Data Controller and the Data Processors; e) subjects or categories of subjects to whom Personal Data may be communicated or who may come to know, in particular if recipients are extra EU countries or international organizations; e) period for which the Personal Data will be stored, or if that is not possible, the criteria used to determine that period; f) existence of an automated decision-making process and, in this case, information about the logic involved, the significance and consequences for the data subject; g) existence of adequate safeguards in case of transfer of Personal Data to an extra EU country or international organization;
- obtain, without undue delay, the update, the rectification or, whether you are interested, the integration of incomplete Data;
- obtain the cancellation, the transformation into anonymous form or blocking of the Data: a) processed in breach of the law; b) no longer necessary in relation to the purposes for which the Data have been collected or subsequently processed; c) if you withdraw consent on which the processing is based and there is no other legal ground for the processing; d) if you object to the processing and there are no overriding legitimate grounds for the processing; e) in compliance with a legal obligation; f) referred to children. The Data Controller may refuse to erase them when the processing is necessary: a) to exercise the right of freedom of expression and information; b) in compliance with a legal obligation, for the performance of a task carried out in the public interest or in the exercise of official authority; c) for reasons of public interest; d) to achieve purposes in the public interest, scientific or historical research purposes or statistical purposes; e) for the exercise of legal claims;
- obtain the restriction of processing when: a) the accuracy of the Personal Data is contested; b) the processing is unlawful and the data subject opposes the erasure of the Personal Data; c) Data are required by you for the exercise of legal claims; d) pending verification whether the legitimate grounds of the controller override those of the data subject;
- receive the Personal Data concerning you in a structured, commonly used and machine-readable format and transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is carried out by automated means;
- oppose, in whole or in part: a) for lawful grounds to the processing of Personal Data regarding you, even if pertaining the purpose of Data collection; b) to the processing of Personal Data that relates to you for the purpose of sending advertising material or of direct sale or for market researches or commercial communication, by means of automated call systems without the intervention of an operator, e-mail and/or traditional marketing methods by telephone and/or paper mail.
- submit a complaint to the competent supervisory authority.

In the cases mentioned above, if necessary, the Data Controller shall communicate any exercise of your rights to each third party to whom the Personal Data are communicated, except for specific cases (for example, if this proves impossible or involves disproportionate effort).

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10. Modalities of Exercise of Rights

You shall be able to exercise your rights anytime:

- by sending a registered letter with return receipt to the address of the Data Controller;
- by sending an email to privacy.germany@trocellen.com ;

11. Data Controller and Data Processor

The Data Controller is:

TROCELLEN GmbH
Mülheimer Straße 26
D-53840 Troisdorf
Phone: +49 2241 2549 000
info@trocellen.com

The appointed Data Protection Officer is:

TROCELLEN GmbH
Detlef Großmann
Mülheimer Straße 26
D-53840 Troisdorf
privacy.germany@trocellen.com

The updated list of Data Processors is kept at the office of the Data Controller.

Troisdorf, 25.05.2018

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