



**PRIVACY NOTICE PURSUANT TO ART. 13 OF GDPR 2016/679 (European Regulation on the Protection of Personal Data)**

Dear Customer, this notice is provided to individual clients and to natural persons acting on behalf of corporate clients, pursuant to Art. 13 GDPR 2016/679 (European Regulation on the Protection of Personal Data).

**1) IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER:** The Data Controller is the company Comer srl – Via Oroboni, 26/28 – 27029 Vigevano (PV) – VAT No. | Tax Code 00174100180 – Tel. 0381 42661 – [privacy@comergroup.it](mailto:privacy@comergroup.it).

**2) PURPOSES AND LEGAL BASIS OF PROCESSING:**

**a. Processing necessary for the performance of a contract to which the data subject is party (Art. 6(1)(b) GDPR)**

Performance of obligations arising from a contract/engagement to which you are a party, or to fulfil your specific requests before and after the execution of the contract. For this purpose, your prior consent to the processing of personal data is not required, since the legal basis legitimising such processing is the necessity to perform a contract with you or to take pre-contractual steps at your request.

**b. For the pursuit of the legitimate interests of the Data Controller (Art. 6(1)(f) GDPR)**

Where necessary, we may also process your data beyond the mere fulfilment of contractual obligations, in order to safeguard our legitimate interests or those of third parties (e.g., legal disputes). Your prior consent is not required for this purpose.

**c. To comply with a legal obligation (Art. 6(1)(c) GDPR)**

For purposes connected with obligations imposed by laws, regulations, and applicable rules, as well as by orders of competent Authorities, your prior consent to data processing is not required, since the legal basis legitimising such processing is the necessity to process your personal data in order to comply with a legal obligation to which the Data Controller is subject.

**d. Based on the data subject's consent (Art. 6(1)(a) GDPR)**

For marketing purposes, to receive our newsletters. You have the right to give or withhold consent by ticking the relevant boxes in the dedicated consent form and/or through the relevant online form (please refer to the dedicated notice). Any consent given may be withdrawn at any time. Withdrawal is valid for the future and does not affect any processing that has already taken place. You may request a list of consents granted at any time.

**3) METHODS OF PROCESSING:** Personal data will be processed by paper and electronic means. We assure you that all necessary and/or appropriate organisational, physical, and logical measures have been implemented to ensure the integrity, confidentiality, and availability of the data.

**4) RECIPIENTS OF PERSONAL DATA:** Personal data processed will not be disseminated publicly, but will be communicated to specifically identified parties. Based on their roles and job functions, both internal and external personnel are authorised to process data within the limits of their competence and in accordance with the instructions given to them by the Data Controller. Such data may also be communicated to parties entitled to access it under applicable laws, regulations, and rules; to postal/courier services, banks and credit institutions, debt collection agencies, law firms, legal advisors, insurance companies, professionals/service providers or suppliers of goods and services acting on behalf of the Data Controller, including sub-contractors, IT companies providing hardware/software maintenance, management and support, electronic invoicing and web application services, cloud computing storage services, consultants, certification bodies, firms/companies providing accounting, fiscal, and tax services, self-employed/occasional workers, couriers, freight forwarders, auditors, and bodies/companies assigned to or having a cooperation agreement with the Controller. The categories of recipients to whom personal data are communicated may process such data as independent data controllers, joint data controllers, or data processors, depending on the specific arrangements in place between them and the Controller. Data processors may, in turn, engage sub-processors, who shall be bound by the same principles, constraints, and responsibilities applicable to the data processor.

**5) DATA TRANSFERS:** The Data Controller does not transfer personal data to third countries, and the management and storage of personal data will take place on servers located within the European Union. It is understood, however, that the Controller shall have the right, where necessary, to relocate the servers or use cloud services outside the EU. In such cases, the Controller hereby guarantees that any transfer of data outside the EU will be carried out in compliance with applicable legal provisions, entering into agreements that ensure an adequate level of protection and/or adopting the standard contractual clauses provided for by the European Commission.

**6) DATA RETENTION:** The Data Controller retains and processes personal data for the time strictly necessary to fulfil the purposes set out herein, or for the period required by applicable civil and tax legislation in force.

#01\_INFORMATIVA CLIENTI\_REV.2026\_GDPR\_COMER



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[www.comergroup.it](http://www.comergroup.it) - REA PV-118809 - R.I. C.F. P. IVA / VAT nr. IT 00174100180 - Capitale Sociale / Share Capital € 80.000





**7) DATA SUBJECT'S RIGHTS:** Pursuant to Arts. 15 (right of access), 16 (right to rectification), 17 (right to erasure), 18 (right to restriction of processing), 20 (right to data portability), and 21 (right to object) of GDPR 679/16, the data subject may exercise their rights by writing to the Data Controller at the address above or by email to [privacy@comergroup.it](mailto:privacy@comergroup.it).

**8) WITHDRAWAL OF CONSENT:** With reference to Art. 7 of GDPR 2016/679, the data subject may withdraw consent at any time.

**9) RIGHT TO LODGE A COMPLAINT:** The data subject has the right to lodge a complaint with the supervisory authority of their state of residence.

**10) PROVISION OF DATA:** The provision of complete personal/identification data and email address for the transmission of administrative documents is mandatory under applicable laws, regulations, and rules, and is a condition for the proper and effective fulfilment of the contractual obligations undertaken; accordingly, any refusal to provide such data will make it impossible to fulfil the contractual obligations assumed. Consent to the sending of advertising material, to the carrying out of market research, to promotional activities, and to the publication of your name on the website is, however, optional.

**11) AUTOMATED DECISION-MAKING:** The Data Controller does not carry out any processing consisting of automated decision-making on the data processed.

