PANOTEC

INFORMATION ON THE PROCESSING OF PERSONAL DATA RELATED TO THE RELATIONSHIP WITH CUSTOMERS AND POTENTIAL CUSTOMERS

Notice provided pursuant to articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR"). The following information is intended for natural persons, including professionals, sole proprietors and representatives/contact persons of companies, bodies, associations and foundations, hereinafter referred to as "Data Subjects".

Identity and contact details of the Data Controller

PANOTEC ITALY S.R.L., with registered office at Via G. Polese 2, 31010 Cimadolmo (TV), Italy, Tax Code/VAT no. and Treviso-Belluno Companies Register no. 05631100269, REA (Economic and Administrative Index) no. TV-460736, represented by its Chief Executive Officer; certified e-mail (PEC): panotec.italy@pec.it; e-mail: privacy@panotec.it .

Purposes and legal bases

A. Management of the pre-contractual phase: personal data are processed for all needs related to handling requests for information and/or quotes.

B. Collection of business information: personal data are processed to collect information to verify the economic, financial and asset situation of the Data Subjects, as well as their solidity, solvency and reliability.

C. Management of the contractual phase: personal data are processed for all needs related to the management of the contractual relationship in all its phases (e.g. management of appointments, organisation of logistics, management of customer support activities and fulfilment of regulatory obligations incumbent on the Data Controller).

D. Soft Spam: the e-mail address provided under the contract is used to promote products or services similar to those already sold or provided.

E. Marketing: contact details are used to send advertising or direct sales material, to carry out opinion and satisfaction surveys, to send commercial communications containing information on the Data Controller's products or services, as well as promotions or invitations to events in which the Data Controller will participate.

F. Profiling: the data are processed to analyse behaviours, habits and consumption propensities in order to meet specific needs and improve the products and services offered by the Data Controller.

G. Communication to third parties for Marketing purposes: the data are transmitted to third parties who, as independent data controllers, will process them for their own marketing purposes.

H. Defensive purposes: the Data Controller may need to process personal data for the management of out-of-court or in-court disputes and litigation.

Purpose	Legal basis (common data)	Legal basis (special categories of data)
A.	Performance of pre-contractual measures taken at the Data Subject's request (art. 6(1)(b) GDPR).	/
B.	Legitimate interest of the Data Controller (art. 6(1)(f) GDPR) connected to the analysis and definition of business strategies and policies, to the identification of parties suitable for starting or continuing commercial relations, to payment methods and conditions and to fraud prevention.	/
C.	Performance of the contract (art. 6(1)(b) GDPR); compliance with legal obligations (art. 6(1)(c) GDPR).	/
D.	Legitimate interest provided for by law (art. 6(1)(f) GDPR and art. 130(4) of Italian Legislative Decree 196/2003).	/
E.	Consent (art. 6(1)(a) GDPR).	/
F.	Consent (art. 6(1)(a) GDPR).	/
G.	Consent (art. 6(1)(a) GDPR).	/
H.	Legitimate interest of the Data Controller in establishing, exercising or defending legal claims (art. 6(1)(f) GDPR).	Establishment, exercise or defence of legal claims (art. 9(2)(f) GDPR).

Storage period

Purpose	Storage time
A.	Time required to handle incoming requests and subsequent correspondence (usually 24 months from the last communication).

Purpose	Storage time
B.	Time required to carry out the checks.
C.	10 years from the termination of the contract.
D.	24 months from the last purchase.
E.	Until consent is withdrawn and in any case no longer than 24 months from collection.
F.	12 months from the recording of the data.
G.	12 months from the collection of consent.
H.	10 years from the final resolution of the dispute.

Nature of the provision of data and consequences of refusal

Purpose	Nature	Consequences
A.	Necessary	Inability to receive the requested information.
B.	Not applicable	/
C.	Necessary	Inability to start or continue the business relationship.
D.	Optional	Inability to receive promotional communications relating to products or services similar to those already sold or provided.
E.	Optional	Inability to receive advertising material, commercial communications, surveys and event invitations.
F.	Optional	Inability to receive personalised communications/advertisements.
G.	Optional	Inability to transmit the data to third parties for their own marketing activities.
H.	Necessary	Inability to manage the litigation.

Recipients of the data

The data are processed by internal personnel authorised for specific tasks and are communicated externally according to the following rules:

Purpose	Categories of external recipients
A.	Companies belonging to the same business group, agents, commercial consultants, retailers, business brokers, sales force in general.
B.	Companies belonging to the same business group, trade information companies, agents, debt collection companies, sales agencies/agents, accounting firms, auditing firms and board of statutory auditors (if appointed), insurance companies, insurance brokers (trade credit policy), law firms for insolvency management.
C.	Companies belonging to the same business group, trade information companies, agents, debt collection companies, sales agencies/agents, accounting firms, auditing firms and board of statutory auditors (if appointed), insurance companies, insurance brokers (trade credit policy), law firms for insolvency management.
D.	Companies belonging to the same business group, marketing consultancy companies, companies providing hosting/technology platform management services.
E.	Companies belonging to the same business group, marketing consultancy companies, companies providing hosting/technology platform management services.
F.	Companies belonging to the same business group, marketing consultancy companies, companies providing hosting/technology platform management services.
G.	Local retailer.
H.	Law firms; debt collection or credit assignment companies; judicial authorities, alternative dispute resolution bodies, insurance brokers, auditing firm and board of statutory auditors (if appointed), insurance companies.

Since the data are also processed with IT tools, they could also be visible to those who carry out assistance/maintenance on these systems.

Transfer of data to a third country or an international organisation

The Data Controller may need to carry out transfers in the context of relationships with business partners established outside the European Economic Area, as well as due to the use of IT services (cloud, backup, etc.): in all these cases, transfers will be carried out in compliance with the specific provisions of data protection law (arts. 44 et seq. GDPR), using, where not otherwise possible, standard contractual clauses.

Rights of the Data Subjects

The Data Subject to whom the personal data refer has the following rights (arts. 15-22 GDPR):

Access: you can find out whether your personal data are being processed and, if so, obtain access to them and request a copy.

Rectification: you can request the updating of your personal data, their correction (if inaccurate) and the completion of incomplete data.

Erasure: you can obtain the erasure of your personal data under certain conditions (for more information contact the Data Controller).

Restriction: you can request that the data be marked so as to restrict their future processing, when certain conditions are met (for more information contact the Data Controller).

Objection: you can object to the processing of personal data, on grounds relating to your particular situation, where the processing is based on legitimate interest or is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller; you can also object at any time to the processing of personal data for direct marketing purposes.

Portability: you can receive in a structured format the personal data provided to the Data Controller and request their transmission to another controller where the processing is based on consent or contract and is carried out by automated means.

Withdrawal of consent: consent may be withdrawn for the purposes for which it was requested, without prejudice to the lawfulness of the processing carried out until then.

The rights that can actually be exercised with respect to the processing activities carried out are:

Purpose	Access	Rectification	Erasure	Restriction	Objection	Portability	Withdrawal of consent
A.	X	X	X	X		X	
B.	X	X	X	X	X		
C.	X	X	X	X		X	
D.	X	X	X	X	X		
E.	X	X	X	X	X	X	X
F.	X	X	X	X	X	X	X
G.	X	X	X	X	X	X	X

Purpose	Access	Rectification	Erasure	Restriction	Objection	Portability	Withdrawal of consent
H.	X	X	X	X	X		

To exercise the above rights, you can use the form available at https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924 and send it to privacy@panotec.it or by PEC to panotec.italy@pec.it. The Data Subject may request further details from the same contacts regarding the above information (e.g. the legitimate interest balancing test or the list of data processors).

To object to the processing of data for the "Soft Spam" purpose, send an e-mail to privacy@panotec.it or use the unsubscribe link included in each communication.

You may lodge a complaint with a supervisory authority: for Italy, the Italian Data Protection Authority (Garante per la protezione dei dati personali – www.garanteprivacy.it).

Notice updated on 30/10/2026