












## PRIVACY POLICY - CUSTOMERS

**Information notice pursuant to Art. 13 of EU Regulation 2016/679 ("GDPR") and GDPR implementing law (Federal Data Protection Act of 30 June 2017 BDSG)**

	<b>1.WHO IS THE DATA CONTROLLER? HOW CAN I CONTACT HIM?</b> The Data Controller is <b>BOFFI TRADE GERMANY GMBH</b> , with registered office in Nymphenburger Straße 5, 80335 München (Germany), in person of its legal representative whom you can reach out to for any requirements writing to: <a href="mailto:info@boffi-frankfurt.de">info@boffi-frankfurt.de</a>
	<b>2.MAIN DEFINITIONS</b> We remind you art. 4 GDPR sets the following definitions out: <b>Personal data:</b> any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can directly or indirectly be identified, in particular by reference to an identifier such as a name, an identification number, a location data, an online identifier or to one or more specific factors to the physical, physiological, genetic, mental, economic, cultural or social identity.

### 3. PURPOSE OF PROCESSING, LEGAL GROUND, DATA RETENTION, NATURE OF CONFERRAL

 PURPOSE OF PROCESSING	 LEGAL GROUND	 DATA RETENTION	 NATURE OF CONFERRAL
<b>A)</b> To perform a contract we have entered into or are trying to enter into with you (contractual and precontractual obligations) and to comply with legal requirements and obligations to which we are subject (legal obligations and administrative/accounting purposes relate to the execution or the ceasing of contract).  We collect or use your information to provide services and goods, including delivery; to comply with the operation of customer accounts and guarantees; for dealing your requests (queries, complaints or claims); to communicate with you.	The processing is necessary for the performance of a contract (C44) Art. 6 par. 1 lett. b) GDPR	3 years, except from the necessary time required by law in relation to contractual and non-contractual issues that may arise	Data conferral is required due to a contractual relationship.  The lack of conferral will prevent the contractual obligation to arise between parties
<b>B)</b> <b>Management of legal aspects</b> relating to our defence in case of precontractual or contractual disputes judgment	Data controller's legitimate interest, provided that interests or fundamental rights and freedoms of data subjects are not prevailing (C47-C50) Art. 6 PAR. 1 lett. f) GDPR	3 years, except from objection and for the necessary time in case of judgment	The provision of data is mandatory. In case of lack, the data the Data Controller would not achieve his legitimate interest as stated for in this purpose. The refusal shall be balanced with the aforesaid data controller's legitimate interest
<b>C)</b> <b>Management of data subjects' requests, pursuant to art. 15 and following GDPR</b> (data subjects' rights)	The processing is necessary to comply with a legal obligation the data controller is liable to (C45) Art. 6 par. 1 lett. c) GDPR	3 year from the closure of the request, except in case of legal disputes	Data conferral is mandatory, being indispensable to grant the fulfilment of any legal obligations

	<p><b>4. DATA RECIPIENTS</b></p> <p>Personal data will not be disseminated. All the personal data may be disclosed to recipients acting as autonomous Data controllers or Data Processors (art. 28 GDPR) and processed by persons appointed to, pursuant to art. 29 GDPR and acting under the authority of the controller or the processor, upon written letter of authorizations relating to purposes and means of processing. Personal data may be disclosed to recipients belonging to the following categories:</p> <ul style="list-style-type: none"> <li>❓ Our affiliated companies, group companies (including holding company) and business partners in the supply chain;</li> <li>❓ Service providers and Contractors, including those who provide IT and telecommunications services in connection with e-mails boxes, services, websites, platforms and other professional services such as consulting services (such as professional or legal advisors and consultants; firms or Companies in the context of tax assistance and consultancy as well as administrative/accounting management relationships; business information companies evaluating solvency and payment habits and/or relating to debt collection)</li> <li>❓ Banks;</li> <li>❓ External auditors or inspectors;</li> <li>❓ Subjects providing Audits or other certifications;</li> <li>❓ Organisations and Public bodies we're legally obliged to share personal information with;</li> <li>❓ Competent authorities for compliance with legal obligations and/or provisions of public bodies, upon request.</li> </ul> <p>The complete listing of Data Processors pursuant to art. 28 GDPR is available by writing us via email: <a href="mailto:info@boffi-frankfurt.de">info@boffi-frankfurt.de</a></p>
	<p><b>5. INTERNATIONAL DATA TRANSFERS</b></p> <p>Personal data will not be transferred to third countries outside the EEA.</p>
	<p><b>6. AUTOMATED-MEAN PROCESSING</b></p> <p>Personal data will be subjected to traditional and manual, electronic or automated processing. Fully automated decision-making processes are not carried out.</p>
	<p><b>7. DATA SUBJECTS' RIGHTS</b></p> <p>Data subjects may assert their rights as expressed in Articles 15 GDPR and following contacting Data Controller at: <a href="mailto:info@boffi-frankfurt.de">info@boffi-frankfurt.de</a>. The Data Controller ensures data subjects the possibility to request, at any time, access to their personal data (Article 15), rectification (Article 16), erasure of the same (Article 17), and restriction of processing (Article 18). The Data Controller communicates (Article 19) any rectifications, erasures, or restrictions of processing to each recipient to whom the personal data has been disclosed. The Data Controller informs the data subjects upon their request about such recipients.</p> <p>The Data Controller ensures the right to data portability (Article 20) and, in the event of requests under Article 20, will provide data subjects with the data in a structured, commonly used, and machine-readable format. Data subjects are entitled the right to object (Article 21) at any time to the processing of data based on legitimate interest by writing to the above contacts with the subject 'objection.</p> <p>If data subjects believe that the processing of personal data by the Data Controller violates any provision of UE Regulation 2016/679, they are free to lodge a complaint with the national supervisory authority, especially in the Member State where they habitually reside or work, or where the violation occurred (<b>The Federal Commissioner for Data Protection and Freedom of Information (BfDI)</b> <a href="https://www.bfdi.bund.de/EN/Home/home_node.html">https://www.bfdi.bund.de/EN/Home/home_node.html</a> or to take appropriate legal action.</p>
	<p><b>8. UPDATES</b></p> <p>We reserve the right to change this Policy. When we do, we will also revise the "Last Review" at the bottom of this Policy. Any changes we may make to this Policy will be effective upon being posted on this page. We encourage you to periodically review this Policy to keep up to date on how we are handling your Personal Information.</p>

**Data Controller**  
**BOFFI TRADE GERMANY GMBH**