

Privacy Notice for the Switchboard and Toll-Free Call Centre

Pursuant to and for the purposes of Article 13 of European Regulation 2016/679 (hereinafter the “Regulation”), we hereby provide you with the following information regarding the processing of personal data that you provide to us when you contact us by telephone or access our call centre via the toll-free number.

1. **Data Controller**

The Data Controller is CONAI – Consorzio Nazionale Imballaggi (National Packaging Consortium), with registered office in Rome, Via Tomacelli 132, and operational office in Milan, Via Pompeo Litta 5.

2. **Data Protection Officer**

The Data Protection Officer (DPO) appointed by CONAI can be contacted by sending an email to dpo@conai.org.

3. **Personal data**

“Personal data” means any information that concerns you and is attributable to you.

Specifically, the processing concerns the following data: forename, surname, telephone number and any additional data you provide during the telephone call (hereinafter the “Data”).

4. **Purpose of processing**

Your Data will be processed to respond to your request and provide you with the relevant information, and also to invite you to take part in anonymous satisfaction surveys regarding the services offered by CONAI.

5. **Legal basis for processing**

The processing of your Data for the purposes indicated in point 4 above has its legal basis in the consent you have given (Article 6.1, point (a) of the Regulation).

6. **Methods of processing**

For the purposes referred to in point 4 above, your Data will be processed in paper form and by electronic means, in compliance with the regulations on the processing of personal data, and adopting appropriate security measures.

The processing of your Data will be managed by CONAI internal staff, who are specifically authorised, trained and instructed to ensure adequate security and confidentiality, and to avoid the risks of loss and/or destruction or access by unauthorised parties.

7. **Communication and dissemination of Data**

Your Data will be processed by LINETECH CUSTOMER CARE SRL, appointed by CONAI to operate the CONAI switchboard and call centre, and specifically designated as Data Processor.

Where necessary for activities related to the management and maintenance of information systems, the Data may also be processed by the company responsible for such activities, specifically designated as Data Processor.

The updated list of Data Processors is available at CONAI’s operational office.

8. **Data retention period**

Your Data will be retained for the period of time strictly necessary to respond to your request, and in any case for a

period not exceeding 15 days from the date of collection, without prejudice your right to revoke your consent as set out in point 9 below.

9. Rights of the data subject

With regard to your Data, you have the right to request CONAI, in the manner indicated in the Regulation and without prejudice to the provisions and limitations set out in Legislative Decree 196/2003 (Part I, Title I, Chapter III):

- access, in the cases provided (Article 15 of the Regulation);
- rectification of inaccurate Data and completion of incomplete Data (Article 16 of the Regulation);
- erasure of Data for the reasons provided (Article 17 of the Regulation), for example where the Data is no longer necessary for the purposes indicated above or is not processed in compliance with the Regulation;
- restriction of processing in the cases provided (Article 18 of the Regulation), for example where the accuracy of the Data is contested and needs to be verified;
- portability, meaning the right to receive, in the cases provided (Article 20 of the Regulation), the Data in a structured, commonly used and machine-readable format, and to transmit such Data to another data controller;
- objection to processing, in the cases provided (Article 21 of the Regulation).

You also have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processing carried out prior to the withdrawal.

All the rights listed above may be exercised by sending a communication to CONAI by certified email (PEC) to conai@conai.legalmail.it or by registered letter to the operational office in Milan, Via Litta 5.

10. Complaints

If you believe that the processing of your Data infringes the Regulation, you have the right to lodge a complaint with the Italian Data Protection Authority, as provided by Article 77 of the Regulation.

11. Nature of Data provision

Providing your Data is necessary in order for us to respond to your request and provide you with the relevant information.

Failure to provide your Data, even partially, will make it objectively impossible to carry out the activities indicated above.

12. Transfer of Data abroad

Your Data is stored at CONAI's premises and on servers located within the European Union.

CONAI