

**PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA PROVIDED THROUGH WHATSAPP BUSINESS CHAT PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION NO. 2016/679 ("GDPR")**

TECO SRL, with registered office in Provaglio d'Iseo (BS) via Sandro Pertini n. 39/41 località Noccole, Tax Code 01238310039 and VAT number 03215890173 (hereinafter "Data Controller"), as the data controller, informs you pursuant to Articles 13 and 14 of EU Regulation no. 2016/679 ("GDPR") that your personal data, provided through the use of the WhatsApp Business chat available on the website [www.tecosrl.it](http://www.tecosrl.it), will be processed in the following manner and for the following purposes.

**1. Object of Processing**

The Data Controller processes your personal data, to be understood as common identifying contact data (telephone number, any name or surname or nickname you have entered on your WhatsApp profile), as well as any other personal data you voluntarily enter in the text of messages sent via chat.

**2. Purpose of Processing and Legal Basis for Processing**

2.1. Your collected personal data are necessary both for the functioning of the chat platform and to allow the Data Controller's authorized operators to:

- provide you with personalized assistance,
- respond to users' requests for information,

The legal basis for the processing is therefore to be found in your explicit consent through the choice to initialize the WhatsApp chat with the Data Controller, which constitutes a free manifestation of consent through unequivocal positive action to the processing of personal data (Article 4, point 11, and Article 6 paragraph 1 letter a. of the GDPR).

2.2. The Data Controller does not use the contact personal data collected through the WhatsApp chat platform for marketing purposes for sending Newsletters or automatic registration to the reserved area of the website [www.tecosrl.it](http://www.tecosrl.it), to which you can still voluntarily register in the "[Reserved Area](#)" section of the Data Controller's website.

**3. Data Processing Methods and Duration**

The processing of your personal data may be carried out. Your personal data may be subjected to both paper and electronic processing.

In relation to the purposes indicated in point 2., your data will be processed lawfully, fairly, and with the utmost confidentiality, by means of the operations provided for in Art. 4 n. 2) GDPR with the support of computer and possibly paper means, in compliance with the security measures referred to in Articles 32 to 35 of the GDPR.

Regarding the data processing methods by the WhatsApp Business platform, Data Processor, please refer to the "[WhatsApp Business Data Processing Terms](#)".

The Data Controller will process personal data for the time strictly necessary to fulfill the purposes for which they were collected, or for the period provided by law or within the provisions of the authority. In the event of your wish to revoke the consent given or express decision of cancellation (which can be activated either directly through explicit request via chat or through the methods illustrated in this notice), your data will be promptly deleted from the Data Controller's WhatsApp Business chat. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

#### **4. Automated Decision-Making Processes**

The Data Controller will not adopt any automated decision-making process, including profiling.

#### **5. Access to Data**

Your data may be made accessible for the purposes referred to in the previous art. 2:

- to employees and collaborators of the Data Controller in their capacity as authorized persons for processing and/or internal system administrators;
- to third-party companies or other subjects (e.g., WhatsApp platform and IT consultants, etc.) that carry out activities on behalf of the Data Controller in their capacity as data processors.

#### **6. Communication of Data**

Pursuant to Art. 6 lett. b) and c) GDPR, therefore without the need for express consent, the Data Controller may communicate your data to Judicial Authorities as well as to those subjects to whom communication is mandatory by law for the fulfillment of said purposes. These subjects will process the data in their capacity as independent Data Controllers. Your data will not be subject to dissemination.

#### **7. Data Transfer**

Personal data may be transferred, also for archiving and storage needs, both to European Union countries and to third countries outside the European Union. In any case, the Data Controller ensures from now on that the transfer of data outside the EU will take place in accordance with the applicable legal provisions.

In particular, with reference to the data collected through the WhatsApp Business Platform, please refer to the provisions of the [WhatsApp Business Data Transfer Appendix](#).

#### **8. Nature of Data Provision and Consequences of Refusal to Respond**

The provision of data for the purposes referred to in art. 2 is optional; you may therefore decide not to provide any data or to subsequently deny the possibility of processing data already provided, revoking the consent given: in this case, you will not be able to receive information or assistance through the Data Controller's WhatsApp Business Chat.

#### **9. Rights of the Data Subject**

As a data subject, you may exercise the rights provided for in Articles 15 to 22 of the GDPR, which we summarize briefly below:

- request access to personal data from the data controller (art. 15);
- request rectification from the data controller (art. 16);
- request erasure of the same from the data controller (art. 17);
- request restriction of processing concerning you from the data controller (art. 18)
- right to data portability (art. 20);
- right to object to processing (art. 21)
- right in relation to automated decision-making processes (art. 22).

Where processing is based on Article 6(1)(a) (consent of the data subject), you have the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal. You also have the right to lodge a complaint with the Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

## **10. How to Exercise Rights**

As a data subject, you may at any time exercise your rights by sending a registered letter with return receipt to TECO SRL at the registered office in Provaglio d'Iseo (BS) via Sandro Pertini n. 39/41 località Noccole or by sending an e-mail to [amministrazione@tecosrl.it](mailto:amministrazione@tecosrl.it).

## **11. Data Controller and Processors**

The Data Controller is TECO SRL with registered office in Provaglio d'Iseo (BS) via Sandro Pertini n. 39/41 località Noccole, Tax Code 01238310039 and VAT number 03215890173. The complete and updated list of Data Processors is kept at the registered office of the Data Controller.