



## WGP Privacy document conforming to art. 13 UE Regulation no. 679/2016 ("GDPR")

White Gold Packaging Srl protects the confidentiality of personal data and guarantees them the necessary protection from any event that could put them at risk of infringement. As required by European Union Regulation no. 679/2016 ("GDPR"), and in particular to art. 13, below is provided to who's interested (called "Interested subject"), all the information required by law, concerning the processing of their personal data.

### SECTION I

#### Who we are and what data we treat (art. 13, 1st paragraph lett. a, art. 15, lett. b GDPR)

White Gold Packaging Srl, represented by its legal representative, based in Inveruno (MI), Via Vittorio Veneto, 12, acts as the data controller and, in the matter of privacy, can be contacted at [privacy@wgp4.com](mailto:privacy@wgp4.com) and collects and/or receives information regarding the interested subject, such as:

Types of data	Examples
Personal Data	Company/Society name, address of registered and administrative office and other places of destination of goods, VAT number and Tax code, telephone and fax numbers, persons to contact and their email addresses
Banking Data	IBAN and bank data according to the payment method

Regarding the contact form on the White Gold Packaging srl website, the data collected are:

Types of data	Examples
Personal Data	Name, Surname, Email address

White Gold Packaging Srl does not require to the interested subject, as they are not necessary for the performance of normal activities, to provide "special" data, or, according to the provisions of the GDPR (Article 9), personal data revealing the racial origin or ethnic, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify an individual, data relating to health or sexual life or sexual orientation of the person. If this condition should change almost completely, the interested subject will receive a specific notice in advance and he will be required to give appropriate consent.

The White Gold Packaging CEO acts as Data Protection Officer (DPO). All interested people can contact him using the email address [privacy@wgp4.com](mailto:privacy@wgp4.com) or the phone number 0039(out of Italy) 0331 1821200.

#### WHITE GOLD PACKAGING srl

##### Registered Office:

Via Vittorio Veneto, 12  
20010 Inveruno (MI)  
Certified email address:  
[whitegold@messaggipec.it](mailto:whitegold@messaggipec.it)  
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W7YVJK9

##### Business Office:

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21013 GALLARATE (VA)  
[info@wgp4.com](mailto:info@wgp4.com)

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## SECTION II

### For what purposes we need the data (art. 13, 1st paragraph GDPR)

The data collected is used by White Gold Packaging Srl to process all the activities deriving from the receipt of an order or from the sending of a purchase request, to provide pre and post sales assistance, to fulfill the legal and regulatory obligations to which it is held according to the activity carried out. In no event White Gold Packaging Srl shall resell the personal data of the interested subject to third parties nor use them for undeclared purposes.

The data of the interested subject will be treated for the principal uses, summarized below:

#### **a) Data collection/entry**

The processing of the personal data of the interested subject takes place in order to proceed with the preliminary activities and consequent to the request for offer or to the receipt of a customer order or to the need to forward a supplier order, to the management of requests for information and contact and/or sending informative material concerning the activity carried out or the products supplied, as well as for the fulfilment of any other obligation deriving from the activity carried out by White Gold Packaging srl.

For the same purpose, the data collection is performed using the Contact form on the Company website, [www.wgp4.com](http://www.wgp4.com).

The legal basis of these treatments is the fulfilment of the activities deriving from the receipt of an offer request or a customer order and from the forwarding of a supplier order, information and contact and/or sending of informative material concerning the activity carried out and the compliance with legal obligations.

#### **b) Management of the contractual relationship**

The processing of the personal data of the interested subject takes place to carry out the preliminary activities and consequently the receipt of an offer request, or a customer order or the sending of a supplier order. These activities can be summarized as follows: the purchase of a service and/or a product from a supplier, the management of the customer order or of the supplier order up to its fulfilment, the pre and post sales support, the shipment of the purchased product, the relative invoice and payment, the handling of complaints or other reports, the provision of any assistance, as well as the fulfilment of any other obligation deriving from the contract, sale or purchase of a product or service.

The legal basis of these treatments is the performance of the services relating to the contractual relationship and compliance with legal obligations.

#### **c) Promotional activities**

White Gold Packaging srl, even without explicit consent, may use the contact details communicated by the interested subject for proposing its own Products/Services, limited to which they are Products/Services similar to those proposed by sale, unless the interested subject himself explicitly opposes it.

#### **d) Promotional activities different from which the interested subject buys**

The personal data of the interested party will not be used for commercial promotion activities on products and services of third parties, unless without any doubt they are necessary for the purposes set out in the previous points and only if the interested subject has not expressed a contrary opinion, once informed in a preventive manner.

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This is the responsibility of the DPO. This treatment can only take place in a way controlled directly by White Gold Packaging Srl.

The legal basis of these treatments is the consent given by the interested subject prior to the treatment itself, which can be revoked freely by the interested party at any time (see Section III).

**e) Security of IT Systems**

The DPO treats the personal data of the interested subject, also through its suppliers, guaranteeing that their computerized management systems or paper ones are protected using all the tools suitable for the purpose, or to ensure that its information system can effectively oppose any attempt at computer intrusion or illegal or malicious acts that compromise the availability, authenticity, integrity and confidentiality of personal data stored for the purposes described above. White Gold Packaging srl will make use of adequate updated passwords, anti-virus and anti-spam software and of a verified anti-theft system, kept active and functioning.

The DPO will promptly inform the interested subjects, if there are particular risks of violation of their data, according to the obligations deriving from the art. 33 of the GDPR concerning notifications of personal data breach.

The legal basis of these treatments is compliance with legal obligations and the legitimate interest of the DPO to carry out processing relating to the protection of corporate assets and the security of White Gold Packaging Srl offices and systems.

**f) Profiling**

The personal data of the interested subject will not be processed for any profiling purposes. If this should become necessary, the DPO will promptly inform the interested subject, explaining explicitly the reasons and purposes to collect his explicit and informed consent. The legal basis of these treatments is the consent given by the interested subject prior to the treatment itself, which can be revoked by the interested subject freely and at any time (see Section III).

**g) Fraud prevention**

If it should be necessary to carry out anti-fraud checks to prevent fraudulent payments, using software systems that perform an automated and preliminary verification of the products/services negotiation, any data of the interested subject will be immediately cancelled upon completion of the check.

**h) Protection of minors (under 18)**

The products/services offered by White Gold Packaging Srl are exclusively reserved to subjects legally able to conclude contractual obligations, based on the national reference legislation.

The DPO, to prevent illegitimate access to its services, implements all preventive measures to protect its legitimate interest, such as checking the tax code and/or other checks (necessary for specific products/services) in addition to the verification of the correctness of the information provided at the contractual level.

**Communication to third parties and categories of recipients  
(art. 13, 1st paragraph GDPR)**

The communication of the personal data of the interested subject takes place mainly towards third parties and/or recipients whose activity is necessary for the performance of the ones related to the established relationship and to respond to certain legal obligations, such as:

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Categories of recipients	Finality
Approved Companies/Societies from White Gold Packaging Srl	Administrative, accounting and contractual compliance obligations
Selected suppliers from White Gold Packaging Srl	Provision of services (production and delivery/shipment of products) related to the contractual obligation
Banks	Management of receipts, payments, refund related to the contractual obligation
Financial administration, organizations and public associations, legal authorities, supervisory and control authorities	Fulfilment of legal obligations in relation to the contractual obligation
Subjects formally delegated or with a recognized legal title (Legal representatives, bankruptcy trustees, etc.)	Fulfilment of legal obligations in relation to the contractual obligation

White Gold Packaging Srl in the person of its DPO imposes the respect of security measures equal to those adopted by it on its Third Party suppliers and their DPO, restricting the perimeter of action to the processing connected to the contractual obligation.

The DPO does not transfer the data of the interested subject to countries where the GDPR is not applied (outside the EU). In the remote situation where this should become necessary, he will inform before the interested subject, specifying the reasons and purposes, to obtain explicit consent.

The legal basis of these treatments is the management of the services needed for the relationship established, the compliance with legal obligations and the legitimate interest of White Gold Packaging Srl to carry out treatments necessary for these purposes.

### SECTION III

#### **What happens if the interested subject does not provide his identification data necessary for the purposes of fulfilling the contract? (Art. 13, 2nd paragraph, lett. e GDPR)**

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The collection and processing of personal data is necessary to carry out all the operations deriving from the receipt of a customer order or from the issue of a supplier order. If the interested subject does not provide the necessary data required, the DPO cannot process the related treatments to the contractual obligations, nor to the obligations that depend on them (a specific form is proposed to collect the necessary information or alternatively the data are derived from the order received or from the supplier offer).

### **What happens if the interested subject does not consent to the processing of personal data for commercial promotion activities on products/services different than those purchased?**

As previously explained, the personal data of the interested subject will not be used for commercial promotion activities on behalf of third parties, unless they are undoubtedly necessary for fulfilling a customer order or placing a supplier order, unless the interested subject has denied consent, once informed in a preventive manner and this is the responsibility of the DPO.

This treatment can only take place in a way controlled directly by White Gold Packaging Srl, as data controller manager.

If the interested subject has consented and should subsequently revoke it or oppose the processing for the activities mentioned above, all personal data will no longer be processed for such activities, without this involving consequences or effects detrimental to the interested subject and for other requested services.

### **How we treat the data of the interested subject (art. 32 GDPR)**

The DPO provides for the use of adequate security measures to preserve the confidentiality, integrity and availability of personal data of the interested subject and he verifies that third-party suppliers and their DPO or Managers have similar security measures.

### **Where do we treat the data of the interested subject?**

The personal data of the interested subject are stored in paper and computerized archives, owned by White Gold Packaging Srl and in any case located in Italy.

### **How long is the data of the interested subject stored? (art. 13, 2nd paragraph, lett. a GDPR)**

Unless the interested subject explicitly expresses his desire to remove them, his personal data will be kept until they are necessary with respect to the legitimate purposes for which they were collected.

In particular, they will be kept for the entire duration in which there is a commercial relationship as a customer or supplier and, in any case, for 10 (ten) years from the termination of the contractual relationship, as required by Italian law obligations.

In the case of data provided to White Gold Packaging srl for the purposes of commercial promotion, for which the interested subject initially gave consent and without the existence between White Gold Packaging Srl and the interested subject of any other contractual form as a customer or supplier, these will be kept for 24 (twenty-four) months, unless the interested subject has revoked the consent.

It should also be added that, if an interested subject submits unsolicited or unnecessary data to White Gold Packaging Srl to fulfil the contractual obligation, White Gold Packaging Srl cannot be considered the owner of this data and it will cancel them in the shortest possible time.

Regardless of the determination of the interested subject to remove them, personal data will always be kept in accordance with the terms established by current legislation and/or national regulations, for the exclusive purpose of guaranteeing specific obligations deriving from the contractual obligation.

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In addition, the data of the interested subject will in any case be kept for the fulfilment of legal obligations (tax and accounting) which remain even after the end of the contract (Article 2220 of the Civil Code); for these purposes the DPO will only keep the data necessary for the related operations.

The personal data will in any case be kept for the time necessary in the event of a legal dispute, arising between the White Gold Packaging srl and the interested subject.

### **What are the rights of the interested subject? (art. 15 – 20 GDPR)**

The interested subject has the right to obtain the following from White Gold Packaging Srl:

- a) The confirmation that data processing concerning him is being processed and, in this case, to obtain access to personal data and the following information:
  1. The purposes of processing data;
  2. The types of data that will be processed;
  3. The recipients or categories of recipients to whom the data have been or will be communicated, in particular if they are recipients of third countries or international organizations;
  4. If possible, the expected data retention period or, if this is not possible, the criteria used to determine this period;
  5. The existence of interested subject's right to request DPO to rectify or cancel the data or limit the processing of the same or to oppose to their treatment and to be informed about the contractual consequences that these adjustments/limitations/oppositions may involve;
  6. The right to inform a supervisory authority in the event of incorrect behavior;
  7. If the data are not collected from the interested subject, all available information on their origin;
  8. The existence of an automated decision-making process, including profiling, and, at least, in such cases, significant information on the logic used, as well as the importance and expected consequences of this treatment for the interested subject;
  9. the appropriate guarantees provided by country outside the EU or an international organization to protect the transferred data of the interested subject;
- b) the right to obtain a copy of the personal data being processed;
- c) the right to obtain from the DPO the rectification of inaccurate personal data concerning the interested subject without unjustified delay;
- d) The right to obtain from the DPO the deletion of personal data concerning the interested subject without unjustified delay, according with the art. 17 of GDPR, including, for example, if they are no longer necessary for the purposes of the processing, once the contractual obligation has been resolved and the storage times have elapsed for accounting and tax purposes;
- e) The right to obtain from the DPO the processing limitation about the data of the interested subject, according with the art. 18 of GDPR (for example the period necessary for DPO to verify the data accuracy). The interested subject must be immediately informed even when the suspension period has been completed or the reason for the limitation of the processing has ceased, and therefore the limitation itself revoked;
- f) The right to obtain communication from who holds the recipients to whom requests for corrections or cancellations or limitations of processing have been transmitted, unless this is impossible or involves a too hard effort;

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- g) The right to receive in a structured format, commonly used and readable by an automatic device, the data concerning the interested subject and the right to transmit such data to another DPO without problems by the DPO to whom he has given them, according with the cases provided for by art. 20 of GDPR, and the right to obtain direct transmission of personal data from one DPO to another, if technically possible.

For any further information and in any case to send a specific request, you must contact the White Gold Packaging DPO at [privacy@wgp4.com](mailto:privacy@wgp4.com). To guarantee that the previous mentioned rights are exercised by the interested subject and not by unauthorized third parties, the DPO may request the same to provide any additional information necessary for the purpose.

#### **How and when can the interested subject reject processing of his personal data? (Art. 21 GDPR)**

For reasons related to the particular situation of the interested subject, the same may always reject the processing of his or her personal data if it is based on legitimate interest or if it occurs for commercial promotion activities; the interested subject must send the request to the DPO at [privacy@wgp4.com](mailto:privacy@wgp4.com).

The interested subject has the right to the cancellation of their personal data if there is no legitimate prevailing reason of the White Gold Packaging srl with respect to the interested subject's one and in any case if the interested subject is against the processing for commercial promotion activities.

#### **To whom can the interested subject make a complaint? (Art. 15 GDPR)**

Without prejudice to any other administrative or judicial action, the interested subject may submit a complaint to the competent control authority in the Italian territory (Privacy Authority) or to the one that carries out its tasks and exercises its powers in the Member State where the violation of the GDPR occurred.

### **SECTION IV**

Below there are more information on the services used by White Gold Packaging srl.

#### **SERVER PROVIDER: WELCOME ITALIA**

**Purpose:** Web Domain, Hosting and backend infrastructure.

**Data Center Site:** Italy.

**Privacy Policy:** <https://www.welcomeitalia.it/it/gdpr/>

**Personal data collected:** various types of data as specified by the Welcome Italia Privacy Policy.

**Special Data used:** Cookies

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#### STATISTICS FOR WEB SITE: ANONYMIZED GOOGLE ANALYTICS (GOOGLE INC.)

**Purpose:** it is a web analytics service provided by Google Inc.

Google uses the personal data collected for tracking and examining the use of <https://wgp4.com>, compiling reports and sharing them with other services developed by Google. Google may use personal data to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics makes anonymous the user's IP address. Anonymization works by shortening the IP address of the Users within the borders of the member states of the European Union or in other countries adhering to the agreement on the European Economic Area. Only in exceptional cases, the IP address will be sent to Google's servers and shortened within the United States.

**Personal data collected:** Cookies and WEB site use information.

**Place of processing data:** United States.

[Privacy Policy](#): adherent to Privacy Shield.

#### GOOGLE TAG MANAGER (GOOGLE INC.)

**Purpose:** used for tag management.

**Personal data collected:** Cookies and WEB site use information.

**Place of processing data:** United States.

[Privacy Policy](#): adherent to Privacy Shield.

#### GOOGLE RECAPTCHA (GOOGLE INC.)

**Purpose:** is a service for spam protection.

**Personal data collected:** Cookies and WEB site use information.

**Place of processing data:** United States.

[Privacy Policy](#): adherent to Privacy Shield.

#### WIDGET GOOGLE MAPS (GOOGLE INC.)

**Purpose:** is a map visualization service managed by Google Inc. that allows <https://wgp4.com> to integrate such content within its pages.

**Personal data collected:** Cookies and WEB site use information.

**Place of processing data:** United States.

[Privacy Policy](#): adherent to Privacy Shield.

### SECTION V

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Any update of this Statement will be promptly communicated by appropriate way. It will also be communicated if the DPO carries out data processing of the interested subject for different purposes than those referred in this Information Notice. DPO will process data only if there is the explicit manifestation of the consent from the interested subject.