Sistema Ambiente S.p.A., as the Data Controller, hereby informs you, pursuant to Articles 13 and 14 of EU Regulation 2016/679 of 27 April 2016 "General Data Protection Regulation" (hereinafter "Regulation"), that for the activity related to Urban Hygiene Services, it is entrusted with on behalf of the Municipality where your activity takes place, it will process some of your personal data.

# Nature and type of data

The personal data we process are those provided by you, which have already been communicated by the competent municipal offices, data obtained from the provision of the Urban Hygiene Service and concern:

* 1. identification, registry, tax and fiscal data relating to the Company Representative and information on property or premises owners necessary for defining the Service Contract, calculating the tariff and distributing waste collection equipment;
	2. any other personal data of Company Contacts communicated in case of requests for additional and special services;
	3. contact data (e.g. telephone numbers, email addresses), communicated during the establishment or variation of the Contract or on the occasion of requests for additional services, reports or complaints;
	4. data relating to deliveries to Recycling Centres or Ecological Islands and the number of exposures of collection containers.

# Purpose of processing and legal basis

Such data will be processed:

* for the realisation of Sistema Ambiente S.p.A.'s institutional purposes and the fulfilment of contractual obligations assumed towards the User and the Municipality. This includes, with regard to the processing of the data subject's personal data, the management services for the collection of urban solid waste, the selection and recovery of urban waste at Ecological Islands and Recycling Centres, the supply and distribution of equipment for separate waste collection, as well as the response to requests for information, assistance and/or intervention and reports of abuse and/or poor service;
* for calculating the due tariff. In this context, data relating to the previous point 1 d) may also be processed through systems for the precise measurement of the quantity of waste delivered, based on the provisions of Municipal Regulations and Law No. 147 of 27 December

2013. This data may also be used for calculating tariff reductions, incentive systems for separate collection or delivery to Recycling Centres, and for initiatives rewarding virtuous behaviours;

* based on the contract and service request, for the provision of additional and special services (requests for clearance, bulky waste collection, asbestos collection, green waste collection and others);
* in relation to the contract and based on the relevant regulatory and statutory provisions, for administrative practices, billing, collection, debt recovery, dispute management and fulfilment of administrative, fiscal, tax and commercial obligations.

# Data provision and retention

The provision of data in points 1 a) and 1 d) is mandatory for the provision of urban solid waste collection service to users and, in general, for the fulfilment of obligations under current regulatory and statutory provisions. The provision of data in point 1 b) is optional, but the lack of such information may preclude the execution of the requested service. The provision of data in point 1 c) is optional, but the lack of such information may slow down the communication process between the Company and the user. Data related to the contract will be retained for the entire duration of the contractual relationship and even afterwards for the fulfilment of legal obligations and for administrative and commercial purposes.

# Recipients of personal data

The personal data you provide will be processed by staff in charge, trained and operating under the authority and responsibility of the Data Controller. Your address and contact details may be given to third parties that perform services inherent to the indicated purposes, for the sole aim of providing the requested service. Personal data may also be processed by third parties who provide instrumental services, including communication services, electronic mail, mail delivery, technical IT services, goods transport companies, banks and credit institutions, debt collection companies, legal, tax and commercial consultancy companies or firms, insurance companies and other service providers inherent to the aforementioned purposes. Only the data necessary for the performance of the relative functions will be communicated to the aforementioned parties. The updated list of all recipients is available at the Data Controller's head office.

# Rights of the person concerned

The person concerned can exercise at any time the rights provided for in CHAPTER III of the aforementioned Regulation.

In particular, he/she has the right to ask the Controller for access to data concerning him/her, their rectification or erasure, completion of incomplete data, restriction of processing; to receive data in a structured, commonly used and machine-readable format; to object in whole or in part to the use of the data; as well as to exercise the other rights recognised by applicable law. These rights may be exercised by writing by post or by e-mail to the following address: privacy@sistemaambientelucca.it

Pursuant to Art. 77 of the Regulation, moreover, the person concerned has the right to lodge a complaint with the Personal Data Protection Authority if they believe that the processing violates the aforementioned Regulation.

# Data controller

The data controller for personal data is Sistema Ambiente S.p.A. - Via delle Tagliate III traversa IV, 136 - B.go Giannotti, Lucca - contactable via the email address privacy@sistemaambientelucca.it