



ITaflon[®]
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PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA 5 COMMERCIAL AGENTS AND REPRESENTATIVES OF AGENCY COMPANIES
Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR")

INTRODUCTION

ITAFILON S.r.l. considers the protection of personal data and the confidentiality of information to be an integral part of the principles governing its relationships with commercial agents, intermediaries and business partners.

In accordance with **Regulation (EU) 2016/679 ("GDPR")**, Italian Legislative Decree No. 196/2003, as subsequently amended and supplemented, and the applicable data protection legislation, ITAFILON S.r.l. adopts appropriate technical and organisational measures to ensure that personal data are processed in accordance with the principles of **lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality**.

This Privacy Notice describes how ITAFILON S.r.l. collects, uses, stores and protects the personal data of natural persons acting as **commercial agents, intermediaries, business partners, sole traders, legal representatives, employees or representatives of agency companies**, in connection with the establishment and management of commercial and agency relationships.

1. DATA CONTROLLER

ITAFILON S.r.l.

Via Giacomo Puccini No. 5
24060 San Paolo d'Argon (BG) – Italy
Tax Code and VAT No. 03942330162
REA BG – 442706

Certified e-mail (PEC): itaflon@progettostudio.legalmail.it

E-mail: info@itaflon.it

2. CATEGORIES OF PERSONAL DATA PROCESSED

Depending on the nature of the relationship, ITAFILON S.r.l. may process the following categories of personal data:

- identification and personal details;
- professional contact details, such as address, telephone number and e-mail address;
- job title, role, function and company or organisation to which the data subject belongs;
- tax, administrative and banking details and payment information, where directly attributable to the data subject;
- information relating to the agency agreement and commercial relationship;
- assigned territory or commercial area;
- information relating to commercial activities carried out;
- information relating to customers, business contacts, orders, quotations and negotiations handled in connection with the relationship;
- information relating to commissions, remuneration and reporting, where attributable to the data subject;
- correspondence and communications exchanged with ITAFILON S.r.l.;
- any further information necessary for the management of the relationship and compliance with applicable legal and contractual obligations.

ITAFILON S.r.l. processes only personal data that are relevant, adequate and necessary for the purposes described in this Privacy Notice.

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3. PURPOSES OF PROCESSING AND LEGAL BASES

Purpose	Description	Legal basis
A. Establishment of the agency relationship	Management of preliminary contacts, assessment of the proposed cooperation, negotiations and execution of the agency agreement or commercial cooperation agreement.	Art. 6(1)(b) GDPR – taking steps prior to entering into a contract and performance of a contract where the data subject is a party to it; in other cases, Art. 6(1)(f) GDPR – ITAFLON's legitimate interest in managing relationships with agency companies.
B. Management of the commercial and agency relationship	Operational management of the relationship, assignment of commercial territories, communications, coordination of activities and management of customers, orders, quotations and commercial negotiations.	Art. 6(1)(b) GDPR, where applicable; for representatives of agency companies, Art. 6(1)(f) GDPR – legitimate interest in the proper management of the commercial relationship.
C. Administrative, tax and accounting management	Management of invoices, commissions, remuneration, payments, reporting and related administrative, accounting and tax obligations.	Art. 6(1)(c) GDPR – compliance with legal obligations and, where applicable, Art. 6(1)(b) GDPR.
D. Compliance with obligations relating to the agency relationship	Management of obligations arising from applicable legislation and, where relevant, social security, contribution or other requirements connected with the agency relationship.	Art. 6(1)(c) GDPR – compliance with a legal obligation to which the Data Controller is subject.
E. Management and development of the commercial network	Organisation, coordination and management of ITAFLON's commercial network and relationships between ITAFLON, its agents and customers within the relevant territories.	Art. 6(1)(b) GDPR and, where applicable, Art. 6(1)(f) GDPR – ITAFLON's legitimate interest in organising and managing its commercial network.
F. Protection of rights and management of disputes	Management of complaints, breaches, disputes and activities necessary for the establishment, exercise or defence of ITAFLON's legal rights.	Art. 6(1)(f) GDPR – legitimate interest of the Data Controller in protecting its rights and interests.

4. NATURE OF THE PROVISION OF PERSONAL DATA

The provision of personal data necessary for establishing and managing the agency or commercial cooperation relationship is required in order to allow ITAFLON S.r.l. to perform the relevant contractual relationship and comply with the associated legal obligations.

Failure to provide personal data that are necessary for these purposes may make it impossible to establish or continue the relationship.

5. SOURCE OF PERSONAL DATA

Personal data may be collected:

- directly from the data subject;
- from the agency company or organisation for which the data subject works;
- in the course of communications and commercial activities;
- from customers, prospective customers and other business contacts;
- from registers, professional directories and other lawfully accessible sources, where necessary and permitted by applicable legislation.

Where personal data have not been obtained directly from the data subject, this Privacy Notice is also provided pursuant to **Article 14 GDPR**, where applicable.

6. METHODS OF PROCESSING AND SECURITY

Personal data are processed using paper-based, electronic and digital systems and by means strictly related to the purposes described above. ITAFLON S.r.l. adopts appropriate technical and organisational measures according to the level of risk and restricts access to personal data to duly authorised persons according to their duties and operational requirements.

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7. AUTHORISED PERSONS, RECIPIENTS AND DATA PROCESSORS

Personal data may be processed by personnel of ITAFILON S.r.l. who have been duly authorised and instructed and, depending on the activities concerned, may be disclosed to:

- administrative, tax, accounting and legal advisers;
- banks and other parties involved in payment processing;
- consultants and service providers involved in the administrative management of the agency relationship;
- IT, software and information system service providers;
- customers, prospective customers and other business contacts, where necessary for the performance of the agent's commercial activities;
- public authorities, social security bodies and other entities to which disclosure is required by applicable law.

Where third parties process personal data **on behalf of ITAFILON S.r.l.**, they are appointed, where the relevant requirements are met, as **Data Processors pursuant to Article 28 GDPR**.

Other recipients process personal data in accordance with the data protection role applicable to the activities they perform.

Personal data will not be disseminated to the public, except where required by law.

8. INTERNATIONAL COMMERCIAL NETWORK

ITAFILON S.r.l. also operates through an international commercial network.

In connection with the management of agency relationships and commercial activities, personal data may therefore be processed or disclosed to persons or organisations operating in other countries where this is necessary for the management of commercial activities and relationships with customers and business partners.

Such processing and disclosure are carried out in accordance with the principles of necessity, relevance and data minimisation established by the GDPR.

9. WHISTLEBLOWING SYSTEM

ITAFILON S.r.l. has implemented an internal reporting system pursuant to **Italian Legislative Decree No. 24 of 10 March 2023**, which transposes **Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law**.

Commercial agents, business partners and, where the relevant legal requirements are met, other persons having a professional or business relationship with ITAFILON S.r.l. may use the internal reporting channel in the cases and in accordance with the procedures laid down by the applicable legislation and ITAFILON's Whistleblowing Procedure.

Personal data processed in connection with the receipt and handling of whistleblowing reports are governed by the specific **Whistleblowing Privacy Notice – Document 02.04**, to which reference should be made for detailed information concerning:

- the categories of data subjects;
- the purposes and legal bases of processing;
- the methods used to process personal data;
- the recipients of the data;
- the applicable retention periods;
- the confidentiality safeguards provided by the applicable legislation;
- the rights of data subjects and any applicable limitations.

10. TRANSFERS OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

Where the processing of personal data involves a transfer to a country outside the **European Economic Area (EEA)**, ITAFILON S.r.l. ensures that such transfer is carried out in accordance with **Articles 44 et seq. of the GDPR**.

Depending on the country concerned, transfers may take place on the basis of an **adequacy decision adopted by the European Commission** or through other appropriate safeguards provided for by the GDPR.

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Data subjects may request further information concerning any international transfers of their personal data and the applicable safeguards by contacting the Data Controller using the contact details set out in Section 1.

11. DATA RETENTION PERIOD

Personal data relating to the agency or commercial cooperation relationship are retained for the entire duration of the relationship and subsequently for the periods required under the applicable civil, tax, accounting and, where relevant, social security legislation and, as a general rule, for **10 years following termination of the relationship or the last relevant accounting or administrative record**.

Personal data may be retained for a longer period where necessary in connection with disputes, legal proceedings, investigations or for the establishment, exercise or defence of legal claims.

Personal data collected during preliminary negotiations that do not result in the establishment of an agency or commercial relationship will be retained for a period proportionate to the purposes for which they were collected and subsequently deleted or anonymised, unless further retention is required by law.

12. AUTOMATED DECISION-MAKING

Personal data are not used for decisions based solely on automated processing, including profiling, which produce legal effects concerning the data subject or similarly significantly affect the data subject within the meaning of **Article 22 GDPR**.

13. DATA SUBJECT RIGHTS

Data subjects may exercise, where applicable and subject to the conditions and limitations laid down by the GDPR, the rights provided for under **Articles 15 et seq. GDPR**, including the right to:

- obtain confirmation as to whether their personal data are being processed and obtain access to such data;
- obtain rectification of inaccurate personal data and completion of incomplete personal data;
- request erasure of personal data where the relevant legal requirements are met;
- request restriction of processing;
- receive their personal data in a structured, commonly used and machine-readable format and exercise the right to data portability, where applicable;
- object, on grounds relating to their particular situation, to processing based on the legitimate interests of the Data Controller pursuant to Article 21 GDPR.

Requests concerning the exercise of data protection rights may be submitted to ITAFLON S.r.l. using the contact details set out in Section 1 of this Privacy Notice.

Data subjects also have the right to **lodge a complaint with the competent Data Protection Authority**, in accordance with Article 77 GDPR.

14. UPDATES TO THIS PRIVACY NOTICE

This Privacy Notice is updated as of **11 August 2026 – Rev. 01**.

ITAFLON S.r.l. reserves the right to update or amend this Privacy Notice in the event of changes to the purposes or methods of processing, the organisation of its commercial network, the systems used or the applicable legislation.

Any material changes will be brought to the attention of data subjects through appropriate means, taking into account the nature of the changes concerned.

Issue date: 11 August 2026

ITAFLON S.r.l.

Data Controller

Language notice: This English version is provided to ensure that international commercial agents and representatives of agency companies can clearly understand the information concerning the processing of their personal data.

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