

CUSTOMER DATA PRIVACY POLICY

Pursuant to Articles 13 and 14 of (EU) Regulation 2016/679

With this document (“**Privacy Policy**”), the Data Controller, as defined below, wishes to communicate to you the purposes and methods of personal data processing, in addition to the rights that (EU) Regulation 2016/679 (the “**GDPR**”) confers upon individuals whose personal data are processed. The GDPR concerns the protection of individuals and the processing of their personal data, as well as the free circulation of said data.

This Privacy Policy is addressed to the **natural persons** – such as directors, managers, employees and contact persons of customers – whose personal data the Data Controller must process in order to stipulate or follow up on service or supply contracts.

Legal persons are also considered natural persons when the two definitions coincide, as may be the case with freelancers and sole proprietorships.

1. The Data Controller

The Data Controller is ALLUFLON SpA, with registered office at 46, Viale F.lli Rosselli, Pesaro, 61121, in the person of its legal representative (hereinafter the “**Data Controller**”).

The Data Controller has appointed a Privacy Officer, whom you can contact to exercise the rights listed in point 8 below, as well as to request any information regarding the processing of your personal data. To do so, please write to: privacy@alluflon.com.

2. The personal data we process

2.1. Nature of the data we process

Alluflon processes the identification and contact information (such as names, surnames, addresses, telephone numbers, email addresses, ID numbers and other contact details) of natural persons (such as legal representatives, administrators, managers, employees, contractors and contact persons) with whom the company interacts to manage contractual relationships, and only for the purposes indicated in this Privacy Policy. The company may also process additional personal data required to execute contractual relationships and to comply with the legal obligations provided for by accounting and tax legislation.

2. Source of personal data

The Data Controller will only process data provided directly by you or collected from third parties (for example, companies and customers for whom the Data Controller operates). This Privacy Policy also covers the processing of personal data acquired by third parties.

3. Purposes of data processing and lawful basis

Your personal data will only be processed to carry out activities related to the stipulation and execution of contracts/orders in order to supply professional services and and/or assign related tasks and mandates. Your data may also be processed to manage administrative, accounting and tax obligations, and to fulfil obligations established by laws, regulations, community legislation, and provisions issued by certified authorities and supervisory and control bodies, as well as for any other need related to

contractual relationships, including after they have been terminated, such as, for example, to defend a right, or for legal obligations.

The lawful basis for processing personal data is as follows:

- If the customer is a natural person:
 - the need to **execute contracts** in compliance with Article 6, Paragraph 1, Letter B of the GDPR; and
 - the **need to fulfil legal obligations** in compliance with Article 6, paragraph 1, Letter C of the GDPR;

- if the customer is a legal person:
 - **the Data Controller's legitimate interest** in processing the personal data of employees, managers, contact persons or administrators of its customers (legal entities) for the purpose of fulfilling supply contracts, in compliance with Article 6, Paragraph 1, Letter F of the GDPR; Consequently, your personal data will only be processed to manage the existing relationship between the Data Controller and the company for which you work, in its capacity as a customer of the Data Controller; and
 - the **need to fulfil legal obligations** in compliance with Article 6, Paragraph 1, Letter C of the GDPR.

4. Nature of data provision and consequences of a refusal to provide personal data

The provision of personal data is a necessary requirement when stipulating contracts. Failure to provide data will make it impossible for the Data Controller to stipulate and execute supply or service contracts.

5. How we process personal data

Your personal data will be processed in compliance with the provisions of the GDPR, using paper, IT or electronic tools, and using an approach strictly related to the aforementioned purposes. We only use methods that guarantee the security and confidentiality of your data, in accordance with the provisions set out in Article 32 of the GDPR.

6. Data storage times

The Data Controller **will only use** your personal data for as long as is required to manage and execute the supply or service contract in question, as well as to fulfil legal obligations.

Subsequently, your personal data will be **stored** for a maximum of 10 years after your contract is terminated, in compliance with the limitation period provided for by the Italian Civil Code.

7. Individuals to whom your personal data may be disclosed or communicated

In order to pursue the purposes described in point 3 above, your personal data may be viewed by certain employees of the Data Controller, in their capacity as persons authorised to process personal data.

Furthermore, your personal data may be processed by third parties belonging to the following categories:

- a) individuals employed by the Data Controller to execute contracts
- b) companies that manage the Data Controller's IT systems

- c) individuals who take care of the Data Controller's administrative and tax obligations
- d) companies and consultants who provide legal advice
- e) authorities and supervisory and control bodies, as well as public or private individuals with roles of public relevance

In some cases, the individuals listed in the above categories operate in total autonomy as separate Data Controllers, and in other cases, they operate as Data Processors specifically appointed by the Data Controller in compliance with Article 28 of the GDPR.

A complete and up-to-date list of the individuals to whom your personal data may be communicated may be requested from the Data Controller's registered office, or by contacting the Privacy Officer.

Your personal data will not be transferred to third parties outside the European Union and are not subject to disclosure.

8. Your rights as an interested party

As the data subject you may, under the conditions established by the GDPR, exercise the rights set out in Articles 15 to 21 of the GDPR with regard to the data processing described in this Privacy Policy, and, in particular, the following rights:

- **right of access:** right to obtain confirmation as to whether or not your personal data are being processed and, if so, to obtain access to your personal data – including a copy of the same – and to request the following information:
 - a) purpose of data processing
 - b) types of personal data processed
 - c) recipients to whom said data have been or will be communicated
 - d) data retention period or the criteria used
 - e) rights of the interested party (rectification, erasure, restriction and right to object to processing)
 - f) right to lodge a complaint
 - g) right to receive information on the origin of personal data if they have not been collected directly from the interested party
 - h) confirmation of the existence of automated decision-making process, including profiling
- **right to rectification:** right to the rectification of inaccurate personal data and/or the updating of incomplete personal data;
- **right to erasure (right to be forgotten):** you have the right to have your personal data erased, when:
 - a) the data are no longer necessary for the purposes for which they were originally collected or processed
 - b) you have withdrawn your consent and there is no other legal basis for their processing
 - c) you have successfully opposed the processing of your personal data
 - d) personal data have been unlawfully processed
 - e) personal data must be erased to fulfil a legal obligation
 - f) personal data have been collected in relation to the company's service offer, as referred to in Article 8, Paragraph 1.

The right to erasure does not apply if data processing is required to fulfil a legal obligation or to perform a task carried out in the public interest or to assess, exercise or defend a right in court;
- **right to restrict data processing:** you have the right to restrict data processing, when:
 - a) as the interested party, you dispute the accuracy of the personal data
 - b) the data processing is unlawful and you oppose the deletion of your personal data and request the restriction of their use instead

- c) the Data Controller no longer needs the personal data for processing purposes, but you need them to be stored in order to establish, exercise or defend a legal claim
 - d) as the data subject, you have objected to data processing, pending verification as to whether the Data Controller's legitimate needs override your own
- **right to object:** you have the right to object, at any time, to the processing of your personal data based on the conditions of legitimacy of legitimate interest, including profiling, unless there are legitimate reasons for the Data Controller to continue processing data that prevail over your rights, interests and freedoms as the interested party, or if they are required in order to ascertain, exercise or defend a right in court.
 - to lodge a **complaint with the Guarantor Authority for the protection of personal data** please write to 121, Piazza di Montecitorio, Rome (RM) 00186.
 - If the legal basis for the processing of your personal data is your specific consent, pursuant to Article 6.1(a), specific information will be given to you. In this case, you have the right to withdraw your consent at any time without affecting the lawfulness of any data processing that was previously carried based on the consent you gave prior to its revocation.

The above rights may be exercised against the Data Controller by contacting the contact person listed in point 1 above.

The Data Controller or Privacy Officer will process your request and provide you with a response without undue delay and, in any case, within one month of receipt of your request.

It is free of charge to exercise your rights as Data Subject within the meaning of Article 12 of the GDPR. However, in the case of manifestly unfounded or excessive requests, including repetitive requests, the Data Controller may deny the request or charge a reasonable fee to cover the administrative costs incurred to manage your request.

Finally, we inform you that the Data Controller may request further information from you in order to confirm your identity as the interested party.