

Dear Customer,

Subject: Information on the processing, communication and movement of data, in application of the European Data Protection Regulation - -Reg. 679/2016 (GDPR)

PREMISE

Pursuant to articles 13 and 14 of EU Regulation 2016/679 (GDPR), laying down provisions for the protection of individuals with regard to the processing of personal data, the Data Controller is required to provide the subject with some information regarding the use of their personal data.

In particular, the undersigned **GECAM SRL** in carrying out its activities / functions needs to process information and personal data related to natural persons operating on behalf of its organization, acting in the role of Data Controller in accordance with the GDPR.

The information and personal data, provided by you, or acquired within the contractual relationship with the undersigned, are treated in compliance with the laws in force and the confidentiality obligations that have always inspired the activity of **GECAM SRL**, as well as in the respect for rights and freedoms fundamental rights, the dignity of the interested party, respect for personal identity and the right to the protection of personal data, with particular reference (see Article 5 - Principles applicable to the processing of personal data) to the principles of lawfulness, correctness and transparency, of the limitation of the purposes, of the minimization of data, accuracy, limitation of retention, integrity and confidentiality.

Data controller is:

GECAM SRL

Via M. Sacchi, 3 - 43126 Parma

Tel. +39 0521798353 - fax +39 0521799505

www.gecam.com gecam@gecam.com

PURPOSE OF THE TREATMENT

The processing of data is aimed at the pre-contractual and contractual management of the activities carried out on behalf of the Customer by **GECAM SRL**. In particular, we highlight the following purposes:

- a. Commercial and pre-contractual management, in relation to all the activities that preceded the contractual stipulation;
- b. Administrative and accounting management;
- c. Management of the design, supply, delivery and assistance services of the solutions and products supplied as per contract and / or order;
- d. Post-sale sales and promotional management, in relation to solutions, new products, organization of events, in line with the proposed services and solutions.

The processing will be carried out with the main support of electronic tools, and may cover data and information on computer or paper media, by authorized individuals.

In general, for the purposes mentioned above, as appropriate, the data will be stored at our company, at the customer's IT infrastructure, at our datacentres, or at our suppliers' datacentre and will be communicated exclusively to the competent subjects, internal or external to the organization, as described below, for the completion of the services necessary for a correct management of the contractual relationship and the underlying services with guarantee of protection of the rights of the interested party.

LEGALITY AND LEGAL BASIS OF TREATMENT

The processing of personal data by the controller is legitimized by the following conditions (art.6 of the GDPR):

- The interested party has given his/her consent to the processing of his/her personal data for one or more specific purposes

- The processing is necessary for the execution of a contract of which the interested party is a party and for the possible execution of pre-contractual or post-contractual measures taken at the request of the same.
- Processing is necessary to fulfil a legal obligation to which the Data Controller is subject (in particular for administrative and accounting purposes).
- The processing is justified by a legitimate interest of the owner, such as sending commercial and / or promotional communications relating to products and services similar to those covered by the contractual relationship.

SCOPE AND CATEGORIES OF SUBJECTS TO WHICH DATA MAY BE COMMUNICATED AND POSSIBLE LIABILITIES

Personal data collected by **GECAM SRL** may be communicated, within the limits and in the forms strictly pertinent to the aforementioned purposes, also to the following subjects or categories of subjects:

- i. Subjects to whom communication is required by law, by regulation or by national and community legislation as well as for the performance of contractual or pre-contractual obligations;
- ii. Credit Institutions, Insurance Companies and other entities for the execution of contractual or pre-contractual obligations (payment of payments, stipulation of compulsory insurance policies, etc.);
- iii. External studies and professionals specialized in consulting for the management of accounting and tax aspects for the fulfilment of the law (e.g. accountant, auditing company, etc.);
- iv. Companies that carry out any activities of transport and shipment of the goods in relation to the customer's personal details.

DATA TRANSFER

As a rule, the Data Controller does not transfer personal data to third countries or to international organizations. For administrative reasons and related to the same (e.g. insurance policies) by the undersigned, some data referring to his / her person / organization could be transferred within the territory of a Member State of the European Union, of a state belonging to the European Economic Area or territory that the European Commission has identified as being able to guarantee an adequate level of protection of personal data under the GDPR, or even to countries outside the EU. In the latter case, the undersigned guarantees that the transfer of data takes place on the basis of an adequacy decision of the European Commission pursuant to art. 45 of the GDPR, or that the transfer of data will be subject to adequate guarantees pursuant to art. 46 of the GDPR, ensuring that those who receive the data are contractually bound at least to the same obligations of the Data Controller.

The undersigned also reserves the right to use services in cloud; in which case, the service providers will be selected among those who provide adequate guarantees, as required by art. 46 GDPR 679/16

DATA CONSENT AND CONSEQUENCES OF MANDATORY/NOT MANDATORY CONSENT FAILURE

The data consent must be considered mandatory with regard to the processing that the organization must carry out to fulfil its obligations towards the data subject on the basis of the existing relationship (or contract), as well as legal obligations, rules, regulations - see paragraph purposes, b) and c) - Failure to provide such data may make it impossible for **COSTA Levigatrics SpA** to carry out the ongoing relationship.

The consent is not mandatory for all other purposes and, even if conferred, can be revoked at any time by the interested party. In the event of failure to provide consent, the consequences will be assessed from time to time, having regard to the specific case. For the purposes a) and d) the communications will always be accompanied by an information for the processing of data and will always be given the right to withdraw from communications of a commercial or promotional nature

DATA STORAGE PERIOD

The data are kept only for the period necessary for the purposes for which they are processed, or in accordance with the laws, national and community laws and regulations to which the organization must comply (e.g. accounting and tax regulations, etc.). It is expected that a periodic check will be carried out annually on the data processed and on the possibility of being able to cancel them if no longer necessary for the intended purposes.

The Controller undertakes to provide feedback within 30 days and, in case of impossibility to comply with these times, to justify the possible extension of the terms provided. The response will be free of charge, except in cases of groundlessness or excessive requests for which a fee may be charged that is not higher than the costs actually incurred for the research carried out.

RIGHTS OF THE SUBJECT

Pursuant to articles 13, paragraph 2, and from 15 to 21 of the Regulations, we inform you that in relation to the processing of your personal data you can exercise the following rights:

- a) Right of access to personal data and to following information:
 - confirmation that the processing of personal data is currently underway;
 - Processing purposes;
 - Categories of personal data;
 - the recipients or categories of recipients to whom the personal data have been or will be communicated;
 - if the data are not collected from the data subject, all the information available on their origin;
 - the existence of an automated decision-making process, including profiling;
 - a copy of personal data subject of the processing.
- b) Right to rectification and integration of personal data;
- c) Right to erasure of data («right to be forgotten») if:
 - 1. personal data are no longer necessary with respect to the purposes for which they were collected or otherwise processed;
 - 2. the subject revokes the consent to the processing of data and there is no other legal basis for the processing;
 - 3. the subject opposes the processing and there is no legitimate overriding reason to proceed with the processing;
 - 4. personal data have been processed unlawfully;
 - 5. personal data must be deleted to fulfil a legal obligation under Union law or the law of the Member State to which the data controller is subject.

The data controller, if he has made public personal data and is obliged to delete it, must inform the other controllers who process the personal data of the request to delete any link, copy or reproduction of your data.

- d) Right to limit the processing in case:
 - 1. the subject contests the accuracy of personal data, for the period necessary for the data controller to verify the accuracy of such personal data;
 - 2. the processing is illegal and the subject opposes the erasure of personal data and requests instead that its use is limited;
 - 3. although the data controller no longer needs it for processing purposes, personal data are necessary for the data subject to ascertain, exercise or defend a right in court;
 - 4. the subject opposed the processing, pending verification of the possible prevalence of the legitimate reasons of the data controller with respect to those of the subject.
- e) Right to lodge a complaint to the Guarantor for the protection of personal data, following the procedures and indications published on the official website of the Authority www.garanteprivacy.it.
- f) Right to portability of subject data, that is the right to receive, in a structured, commonly used and automatically readable form, personal data concerning you provided to a data controller and transmit them to another data controller, if the processing is based on consent or a contract and is carried out by automated means. When technically possible, the data subject has the right to obtain direct data transmission from one data controller to another.

INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA

- g) Right to opposition at any time to the processing of personal data, including profiling, in particular when:
1. processing is carried out on the basis of the legitimate interests of the controller, after having clarified the reasons for the opposition
 2. personal data are processed for direct marketing purposes.
- h) Right not to be subjected to a decision based solely on automated processing, including profiling, except in cases where the decision is necessary for the conclusion or execution of a contract between the data subject and a data controller, is authorized by the law of the Union or of the Member State to which the controller is subject or based on the explicit consent of the data subject.

Right to withdraw consent at any time; the data, if not based on another legal basis (including, fulfilment of a legal obligation or execution of a contract) must be deleted by the controller.

For the processing legitimated by a consent, the subject has the right to revoke it at any time without prejudice to the lawfulness based on the consent given prior to the revocation.

Kindest regards.

THE DATA CONTROLLER