

## PRIVACY INFORMATION NOTICE

Siderforgerossi Group SpA (hereinafter the “Data Controller”) has adopted and put in place corporate Procedures and Policies in accordance with the new General Data Protection Regulation issued by the EU (GDPR - Regulation (EU) 2016/679), with the aim of guaranteeing high standards of security along with the rules to be followed to ensure suitable processing of personal data.

- 1) **The Data Controller** is SIDERFORGEROSSIGROUP SpA, VAT 03862910241, with registered office in 36011 Arsiero (VI) - Italy, via Cartiera di Mezzo 38 (hereinafter also the Controller)

Any requests regarding this Privacy Policy, the protection of personal data and the level of security of such information should be sent to the Data Controller's registered office or by email to [privacy@siderforgerossi.com](mailto:privacy@siderforgerossi.com)

### 2) Purpose of the processing

The purposes of the processing are listed below, next to the relative applicable legal basis.

| Purpose of the processing   | Legal basis for the processing  |
|---|---|
| Supply of forged steel parts  | processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Art. 6 c. 1 lett b)) |
| Updates on the options and characteristics of the operating forging processes | processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Art. 6 c. 1 lett b)) |
| Invoicing   | processing is necessary for the performance of a contract to which the data subject is party or in order to fulfil a legal obligation (Art. 6 c. 1 lett b) e c))  |
| Debt recovery and assignment  | the processing is necessary to pursue the legitimate interest of the Data Controller which consists in credit protection purposes (Art. 6 c. 1 lett f))   |
| Prevention of IT and non-IT based fraud                                       | the processing is necessary to pursue the legitimate interest of the Data Controller which consists in protection against fraudulent activities exercised also by third-parties (Art. 6 c. 1 lett b))             |
| Marketing initiatives related to the acquisition of new customers             | Consent (Art. 6 c. 1 lett a))   |

#### Siderforgerossi Group SpA

Registered office and administration headquarters: 36011 ARSIERO [VI] ITALY - Via Cartiera di Mezzo, 38 - P.O. Box 42

Tel. +39 0445-714400 - Fax +39 0445-714444 - VAT no. IT03862910241 - AEI: VI - 360434 - [info@siderforgerossi.com](mailto:info@siderforgerossi.com) – PEC (certified email): [siderforgerossi@legalmail.it](mailto:siderforgerossi@legalmail.it)

Fully paid-up share capital Euro 5,000,000.00



Production units: • 36011 ARSIERO [VI] Via Cartiera di Mezzo, 24/38 - Tel. +39 0445 714400 - Fax +39 0445 714444 • 36010 COGOLLO DEL CENGIO [VI] ITALY Via M. Schiro, 2 - Tel. +39 0445-714422 / Fax +39 0445-714455 • 36010 VELO D'ASTICO [VI] - Via dell'Industria, 32 - Via della Tecnica, 26 - Via dell'Artigianato, 18 • 10080 BUSANO CANAVESE [TO] - Via Rolando Perino, 37 - Via Stefano Bruda, 39- Tel. +39 0124-477333 / Fax +39 0124-477303

### 3) Processing methods

Personal data shall be processed in writing and/or on magnetic, electronic and computerised devices; collection of data is optional, but failure to grant your consent may make it impossible to fulfil our contract obligations and/or any requests made by the Data Subject.

### 4) Recipients of personal data

Without prejudice to the communications and disclosures made to comply with legal obligations, to ensure credit protection and improved management of our rights relating to each individual commercial relationship, your personal data may be communicated, exclusively for the purposes related to contract requirements and/or to processing your request, to the following entities:

- Our reseller network
- Marketing agencies
- credit institutes
- debt recovery companies
- commercial information companies
- experts and consultants
- Financial statement auditing/certification companies
- firms operating in the transport sector

### 5) Data retention

Personal data will be stored and retained for the term indicated in the chart below:

| Categories                           | Duration  |
|--------------------------------------|---|
| Customers and Suppliers              | 10 years  |
| Customer data for marketing purposes | Up to 7 years after the end of relationship                     |
| Prospective Customers                | 24 months   |
| Applicants                           | 24 months from applications                                     |
| Guest and Visitors                   | No more than 30 days from the exit of Siderforgerossi buildings |

### 6) Rights of the Data Subject

With regard to such data, natural persons shall be entitled to exercise the rights foreseen by Chapter III arts. 12 to 23 of Regulation (EU) 679/2016 (GDPR).

Please find below the rights granted by arts. 15 and 16 of Regulation (EU) 679/2016 which can be exercised by all data subjects:

**Siderforgerossi Group SpA** 1. The data subject shall have the right to obtain from the Controller confirmation as to whether or not

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personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
  - b) the categories of personal data concerned;
  - c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
  - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
  - e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
  - f) the right to lodge a complaint with a supervisory authority;
2. The Controller shall, at the request of the data subject, provide a copy of the personal data undergoing processing. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.
3. The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
4. The data subject shall have the right to obtain from the controller without undue delay the erasure of personal data concerning him or her if:
- a) the personal data are no longer necessary in relation to the purposes for which they were collected;
  - b) the personal data have been unlawfully processed;
  - c) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;

Point 4 is not applicable when the processing is necessary: for the establishment, exercise or defence of legal claims.

5. If the legal basis of the processing is based on consent, the data subject is entitled to exercise the right to withdraw consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

The above listed rights can be exercised in writing addressed to the contact details provided in the “Data Controller” section.

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