

INFORMATION RELATING TO THE PROCESSING OF EMPLOYEES' PERSONAL DATA PURSUANT TO ARTICLES. 13 E 14 OF EU REGULATION 2016/679 AND OF LEGISLATIVE DECREE. N°196/2003 AND S.M.I.

Interested parties: Customers.

Dear Customer,

FILTOMATIC FASTENERS S.r.l. (hereinafter the "Company") as Data Controller with registered office in Via G. Galilei, 5 – 20856 Correzzana (MB), in the capacity of Data Controller of your personal data, pursuant to and for the purposes of Regulation (EU) 2016/679 hereinafter 'GDPR', hereby informs you that the aforementioned legislation provides for the protection of interested parties with respect to the processing of personal data and that such processing will be based on the principles of correctness, lawfulness, transparency and protection of your privacy and your rights. To achieve its purposes, relating to the management of the relationship, the Data Controller needs to acquire data personal data, such as, for example, name and surname, telephone or mobile number, address, the e-mail, the tax code/VAT number, and other data or information on the type of service requested, only if necessary for the purposes indicated, according to the principle of "minimization". Your personal data will be processed in accordance with the legislative provisions of the aforementioned legislation and of the confidentiality obligations set out therein.

1. Purpose and legal basis of the processing:

Your data will be processed for the following purposes related to the implementation of obligations relating to:

- Fiscal and accounting obligations; legal basis: legal obligation;
- Management of any electronic payments; legal basis: legal obligation;
- Obligations established by current laws; legal basis: legal obligation;

2. Consequences of failure in the communication:

The processing of data is necessary in response to the customer's request for the purposes indicated, if not communication, or incorrect communication, of any of the mandatory information, may cause the impossibility of Owner to guarantee the requested services.

3. Optional purposes:

Market investigations, statistics and for promotional activities also related to the sending of advertising material and promotional - by e-mail, post and/or text message and/or telephone calls - other than those necessary to guarantee the execution of the report. The legal basis of the above purposes is consent.

4. Consequences of refusal to optional purposes:

The provision of data is optional for you with regard to the aforementioned purposes, and your possible refusal to treatment does not compromise the continuation of the relationship or the adequacy of the treatment itself.

5. Treatment methods:

The process is carried out with manual and/or IT and telematic tools, in order to guarantee security, the integrity and confidentiality of the data in compliance with the physical and logical organizational measures envisaged by the current provisions, so as to minimize the risks of destruction or loss, unauthorized access, unauthorized modification and disclosure in compliance with the methods set out in the articles. 6, 32 of the GDPR.

6. Recipients:

To carry out certain activities, or to provide support for the operation and organization of the activity, some data may be disclosed or communicated to recipients. These subjects are divided into:

Third parties: (communication to: natural or legal persons, public authorities, service or other body which is not the interested party, the data controller, the data controller and the authorized persons responsible for the treatment) including:

- Banking institutions for the management of collections and payments;
- Companies that manage traditional or computerized postal services (if necessary for the purposes indicated);
- Consultants and freelancers, also in associated form in legal matters, etc. as owners self-employed;
- Subjects/Bodies, by legal obligation, possibly whose right to access your data is recognized by legal obligations;

Data controllers: (the natural or legal person, public authority, service or other body that processes personal data on behalf of the data controller)

- Companies and other individuals, consultants and freelancers who have been granted mandates for the management of mandatory fiscal, administrative, accounting and legal consultancy obligations, etc;
- Any suppliers of IT services, web, or other services necessary to achieve the purposes necessary for managing the relationship.

Within the company structure: your data will be processed exclusively by expressly staff authorized by the Owner, with assurance of adoption of a confidentiality agreement and, in particular, by the following categories of employees:

- Direction;
- Administration;
- Secretariat;

7. Diffusion:

Your personal data will not be disclosed in any way.

8. Transfer of data to third countries:

The owner does not transfer personal data to non-EU countries. If necessary, they will be done in advance interested parties informed, and guarantee measures will be adopted for the transfer towards the recipients, which depending on the case may be: verification of the existence of adequacy decisions for the country recipient by the Commission, signing of standard contractual clauses, verification of adoption of any additional measures in implementation of the EDPB recommendation 01/2020. Notwithstanding these guarantees, for data processing (in reference to art. 49 of the GDPR), where applicable, the existence of a contract is verified or pre-contractual measures in favor of the interested party or consent to the transfer.

9. Retention period:

We inform you that, in compliance with the principles of lawfulness, limitation of purposes, data minimization, pursuant to of the art. 5 of the GDPR, the retention period of your personal data necessary to perform the services requests, is established for a period of time not exceeding the achievement of the purposes for which they are collected and treated, in the event that there is a contract, or a verbal agreement of performance this period of conservation may cease with the forfeiture or withdrawal of the contract or service, the same data may be kept, where applicable, for a further period of time, approximately 1 year from the end of the contract / agreement, in order to guarantee the workmanship for any further interventions on the services performed, or for the management of any disputes, the legal

basis of such conservation is the execution of pre-contractual agreements, or contractual obligation, and for disputes the legitimate interest of the owner of the treatment. With the same data protection methods and guarantees, the same may be stored for a period of time in compliance with the obligations prescribed by current laws, by way of example on the basis of tax legislation for at least 10 years.

10. The Data Controller:

The data controller is FILTOMATIC FASTENERS S.r.l. in the person of its Representative Legal, with registered office in Via G. Galilei, 5 – 20586 Correzzana (MB), contactable at the following e-mail address: info@filtomatic.com

11. Rights of the interested party:

Pursuant to the articles. 15 and following of EU Regulation 2016/679, the interested party is granted the right to exercise specific rights towards us. In particular, you will be able to:

- obtain confirmation of the existence of personal data concerning him, even if not yet registered, access to the same data and their origin, as well as the purposes and times of conservation, the methods of processing and the logic applied in case of processing carried out with automated tools;
- revoke any consent given in relation to processing for purposes of direct and indirect marketing, as well as for profiling without prejudice to the lawfulness of the processing carried out be up to that time;
- receive the data in a structured, commonly used and machine-readable format personal data processed and, unless it is not technically feasible, transmit the data directly personal to another Data Controller;
- obtain the cancellation, transformation into anonymous form or blocking of data of which it is not owned conservation is necessary in relation to the purposes for which the data were collected and processed;
- obtain the updating, rectification and integration of the data processed;
- object, in whole or in part, for legitimate reasons, to the processing of personal data that concern, even if pertinent to the purpose of the collection;
- lodge a complaint with the supervisory authorities.

It is specified that the exercise of these rights must not prejudice and/or damage the rights and freedoms of others.

You can exercise these rights at any time by writing by post to Via G. Galilei, 5 – 20586 Correzzana (MB), by contacting the e-mail address: info@filtomatic.com

It is understood that, where requests are submitted by electronic means, the information will be provided free of charge and in a commonly used electronic format.

If the requests of the interested party are manifestly unfounded or excessive, in particular for their repetitive nature, the Company may alternatively: charge a reasonable expense contribution taking into account the administrative costs incurred in providing the information or communication or take the required action; or refuse to comply with the request. In both circumstances the Company provides adequate justification to the interested party.

Correzzana (MB), 4 July 2022