



PRIVACY POLICY OF THE PROCESSING OF PERSONAL DATA FOR CLIENTS AND SUPPLIERS

Rottami Padana SpA, in its quality of Owner of data processing, wishes to inform you that EU Regulation 2016/679 (hereafter GDPR) regulate the protection of personal data. Rottami Padana SpA treats the processing of personal data according to the principles of correctness, lawfulness, transparency and necessity, thus protecting your rights.

To this end, and according to the article 13 of the GDPR, we provide you with the following information.

1. Processing purposes

The processing of your data has the following purposes:

- a) completion of administrative and management activities, in compliance with the fulfillment of accounting and tax obligations, and any other obligations imposed by current legislation; fulfillment of the existing contractual and pre-contractual obligations with you;
- b) marketing activities.

The provision of data for the purposes referred to in paragraph 1 letter a), it is mandatory and the related processing, pursuant to current legislation, may be made without the consent of the person concerned. The lack of data provision will result in our inability to fulfill and comply with the commitments undertaken in your comparisons and arising from the existing contractual or pre-contractual relationship.

The provision of data for the purposes referred to in paragraph 3, letter b) is optional and must be provided in accordance with the procedures expressly provided for in the article 7 of the GDPR.

Communications related to marketing activities may take place through the use of traditional methods (e.g., phone calls), automated and similar (e.g. e-mail).

If you are already our customers, we can send you commercial communications related to services similar to those already used, except for your dissent.

2. Processing modality

Data processing will be carried out according to the art. 4 n. 2) of the GDPR, by means of the following operations: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.

Your data will be processed either on paper or electronic and/or automated.

Your data, starting from their receipt/update, will be stored for a reasonable period in relation to the purposes of the processing referred to at point 1.

3. Communication and data transfer

Your data, object of the processing, will not be diffused; they may, for the purposes indicated in this notice, be communicated to employees of Society that work as people authorized and instructed, third parties, among which business partners, consultants and freelancers, banks and credit institutions, insurance companies, financial companies, factoring, leasing, services, management and credit recovery, auditors, debt collection companies, public authorities, auditing or supervisory bodies, to fulfill obligations deriving from the law, regulations, community regulations or for aspects concerning the management and execution of the legal relationship with you, occurring or occurred.

4. Rights of the people involved

It is specified that in your quality of people involved, at any time you may be request:

- a) the access to your personal data;
- b) their correction in case of inaccuracy;
- c) cancellation of the data referring to you;
- d) the limitation of processing;
- e) the right to oppose to the processing of your data where the conditions are met;
- f) the right to data portability, i.e. to receive the personal data provided in a structured format that is commonly and automatically readable by an automatic device.

Although not expressly provided for by the provisions referred to above, reference should be entirely made to the effective legislation on the subject of Privacy and specifically to the articles 15, 16, 17, 18, 20 and 21 of the GDPR. It is furthermore your right to submit a complaint to the Personal data Guarantor Authority (art. 13.II letter d) of the GDPR).

5. Withdrawal of consent

Your consent may be revoked at any time without this being able to:

- prejudice the lawfulness of the processing based on the consent given before the withdrawal;
- prejudice further processing of the same data based on other legal bases such as contractual or legal obligations.