

Disclosure pursuant to Arts. 13 and 14 of EU Regulation 2016/679 and of Italian Legislative Decree. 196/03, as amended
Applicable legislation concerning Personal Data Protection

Types of personal data processed

1. Dear **CUSTOMER**, as Data Controller, pertaining to the implementation of any relevant professional relationship, we would like to inform you that any data deemed of personal nature by the applicable statutory provisions, which you provide, including verbally, or are collected by third parties (such as, by way of example: our network of agents or brokers, Distributors, Commercial information companies, registers, public lists or databases, professional associations, other public subjects, etc.), to include business name, address, VAT number, Tax ID number, telephone and fax number, email, name and surname, mobile number, as well as all such data relating to your contact persons involved in the business relationship, and economic and commercial data, such as bank details and financial solvency, may be subject to processing in compliance with applicable legislation concerning the protection of personal data and the obligations of accuracy, lawfulness, transparency and confidentiality.

Purposes of processing, legal basis and provision of personal data

2 a) Data will be processed for the following purposes:

- Pre-contractual requirements, such as, offers and price quotes, and contract-relating matter pertaining to our products and/or services;
- Administrative, financial, organizational and commercial management of the existing professional relationship, including any statistical surveys, and related compliance with civil, tax, accounting, regulatory and EU laws;
- Storage for the purpose of accounting records requirements;
- Protection of contractual rights afforded by the Undersigned Company hereunder, even in case of litigation;
- Requirements resulting from provisions issued by authorities authorized by statutory provisions or supervisory bodies.

For the aforementioned purposes, processing is necessary to fulfill legal requirements and to implement the existing contract or pre-contractual measures taken at your request for the purpose of providing price quotes and offers. Therefore, the processing of your data for the aforementioned purposes does not require your explicit consent and any refusal to provide data will make it impossible for the Undersigned Company to deliver services.

2 b) Furthermore, we undertake to process your Data for the following additional purposes:

- Delivery through telephone contact by operator or electronic mail of promotional, advertising and commercial communication, as well as offers concerning our products and/or services you may have previously purchased;
- Analysis of the perceived quality of our products and/or services (customer satisfaction) in order to improve them or to maximize customer satisfaction;
- Delivery of newsletters and/or communication, via e-mail or by telephone contacts with an operator, relating to our initiatives, such as participation in fairs, organization of events, anniversaries and launch of new products and/or services;

For the aforementioned purposes, the provision of data is optional. Your refusal in this regard will just make it impossible for us to implement initiatives to improve the services we deliver to you, and to keep you abreast of new offers. Furthermore, we point out that, on the statutory basis of the Data Controller's legitimate interest, the e-mail address you provided at the time of previous purchases of products and/or services, can be used for commercial and promotional purposes without your consent, notwithstanding your right to object to data processing, which you can exercise at any time.

Data processing modalities and duration

3. Your data will be processed in paper and electronic form, in compliance with statutory provisions that preserve data confidentiality and safety, as well as their accuracy, update and relevance, as it pertains to all to all aforementioned purposes. In addition, individuals who have not been previously authorized will not have access to or process your personal data.

We will keep your personal data for as long as we entertain business relations with you, and, as regards the purposes indicated in paragraph 2 b) until you notify us that you are no longer interested in receiving our commercial and/or promotional and/or advertising communication. In any case, your data will be stored in compliance with statutory or regulatory requirements (such as, for proper bookkeeping, to archive contractual documents in case of dispute or liability matters), for a period of 10 years, after which data will be deleted or made anonymous.

Electronic commercial and/or promotional and/or advertising communication will require the use of third-party supports, like the Mail-Chimp platform, which will serve as Data Processor. The Data Processor will use statistical tracking systems through web beacons embedded in email communication, which detects when email messages are opened and how many clicks are made on hyperlinks contained in the email), identifying, in particular, quantity and date (according to inferable technical specifications prepared by the service provider in the document accessible on: <https://mailchimp.com/legal/privacy/>. Furthermore, your personal data, and, in particular, name and surname, company name and address (if any), and email address will be transferred to the United States of America, and, in detail, on the platforms of Mail-Chimp, which, to this end, declares that it adheres to the US-EU Privacy-Shield pact which safeguards personal data transferred <https://www.privacyshield.gov/participant?id=a2zt0000000TO6hAAG&status=Active>.

Data dissemination, transfer and communication

4. Without prejudice to communication made in fulfillment of requirements set forth in laws, regulations or EU legislation, your data will be processed by our employees and collaborators, consistent with tasks under their respective purviews, and may be shared in Italy and abroad with: i) banks and other subjects operating in the banking sector; ii) Public Authorities or Institutions; iii) IT and business consulting companies; iv) credit recovery and insurance companies; v) professional and/or companies providing services and consultancy (for example, in matter of accounting, tax, legal,

logistics or transport, etc.), vi) other controlled and/or affiliated Group companies; vii) subjects who require access to your data for legitimate business/administrative matters related to our business relationship; viii) our network of agents and brokers. In any case, only personal data deemed necessary to achieve the purpose for which they were collected will be shared, in full compliance with data safety and confidentiality measures. These categories of subjects process data as independent data controllers, for the purposes defined above.

Rights of the data subject

5. With regard to data, and at any time, you can exercise rights afforded to you by Articles 15-22 and Art. 34 of Regulation (EU) 2016/679, by means of a written request addressed to the Data Controller, whether by e-mail or regular mail, certified email (PEC), or through a delegated subject, pursuant to the methods set forth in Art.12 of Regulation (EU) 2016/679 and the limitations provided for by Title I - Chapter III of Italian Legislative Decree 196/2003, as amended, and specifically to: (i) gain access to personal data, learn about data origin, processing purpose, logic applied to processing by electronic tools, data categories, recipients (or categories thereof) to whom data will be communicated, retention period and data provision in intelligible form; (ii) obtain rectification, supplement, erasure of the data or restriction of their processing; (iii) object to the processing of your personal data; (iv) receive data portability, where relevant; (v) withdraw consent at any time; (vi) pursuant to Art. 77 of Regulation (EU) 2016/679, if you believe that data processing violates the applicable legislation on the protection of personal data, lodge a complaint with the Italian Guarantor for the protection of personal data or the supervisory authority of the EU Member State in which you habitually resides or works, or of the place where the alleged violation occurred.

In addition, subjects or categories of subjects to whom data are communicated or who become aware of them, in the capacity of Managers and/or authorized parties can be provided to you by the Data Controller.

Finally, the Data Controller informs you that data provision, in response to a request initiated by you or to exercise your right may involve the reimbursement of related costs.

Contact details and policy update

6. The Data Controller is the undersigned company, with registered office and contact details as provided in the footer of this privacy policy.

The Data Controller undertakes to keep this Policy constantly updated. The revision in the page header indicates the date on which the privacy policy was updated. The Data Controller will also make any updated privacy policy public through its website <http://www.cerdomus.com/>, or available by request.

Data Controller: **CERDOMUS SRL**