Azienda Metalli Laminati spa

Strada Alessandria 16
15044 Quargnento (AL)
P.IVA 06529320159
PEC : aziendametallilaminatispa@arubapec.it

INFORMATION ON THE PROCESSING OF PERSONAL DATA - CUSTOMERS
pursuant to article 13 and 14 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (GDPR)

AZIENDA METALLI LAMINATI S.P.A. (hereinafter referred to as the "**Company**" or "**Controller**"), with registered office in Strada Alessandria 16, 15044 Quargnento (AL), which can be contacted at privacy@kme.com, informs you that is the Data Controller of your personal data processed for the establishment, management and/or execution of the contract and the fulfilment of legal and regulatory obligations to which the Company is subject. The Company may also process personal data relating to your employees and / or collaborators only as necessary for the same purposes.

The data processing will comply with the current legislation on the protection of personal data, including the Regulation (EU) 2016/679 (the "**GDPR**").

In view of the importance accorded to the protection and security of the individuals to whom such data refers, the Controller has appointed a Data Protection Officer (hereinafter referred to as the "**DPO**"), according to art. 37-39 of the GDPR. The DPO may be contacted for matters relating to the data processing, including the exercise of data subject's rights, at dpo.aziendametallilaminatispa@kme.com.

1. Categories of personal data and data processing methods

The Controller will collect and/or receive certain general personal data (including first name, surname, physical and electronic address, telephone number, current account number, VAT number, tax code) about you and possibly also of your directors, employees and / or collaborators. Personal data will be processed (for the definition of "processing of personal data": article 4 number 1 and number 2 of the GDPR) by the Controller in full compliance with Chapter II (Principles) and Chapter IV (Controller and processor) of the GDPR. In particular, personal data will be processed in a lawful, correct and transparent way towards the data subject, collected for the purposes here below, explicit and legitimate, as well as adequate, relevant and limited to what is necessary with respect to the purposes for which they are processed.

2. Purposes and legal basis of the data processing

The Controller informs you that personal data, including identifying and fiscal data, will be processed for the following purposes:

a) for the management of the supply contract and consequent regulatory and other requirements
Personal data is processed in order to carry out preliminary and consequent activities to the management of the supply contract and those instrumental and functional to its fulfilment, as well as to fulfil all other contractual obligations.
Personal data is also collected from third parties, such as, by way of example:
- other data controllers, e.g. legal entities or the companies of the group to which the Controller belongs;
- lists held by public or equivalent entities or those under the control of the public authority in accordance with specific national and/or European legislation;

b) for communication to third parties and addressees
Personal data is processed according to the contract and the ensuing legal and/or regulatory and/or other obligations. Your personal data will not be disclosed to any third parties/addressees for their own autonomous purposes, unless:
- you have authorised this;
- this should be necessary in order to fulfil obligations arising from the contract and provisions of law governing it;
- communication is made to the companies of the group to which the Controller belongs, for administrative purposes: companies involved in administrative and accounting management; banks for the management of collections and payments; financial administrations and public entities in fulfilment of regulatory obligations, including deriving from group membership; IT services providers (e.g. web hosting, data entry, infrastructures maintenance and management and IT services, etc.);

c) to offer you similar goods and/or services (so-called "soft spam").
Pursuant to Article 130(4) of Italian Legislative Decree No. 196/2003 (the Italian "Privacy Code", as amended by Legislative Decree No. 101/2018), the email address you have provided may be used by us in the future to offer you similar goods and/or services (so-called "soft spam"), without prejudice to your right to object at any time, easily and free of charge;

d) to establish, exercise or defend legal claims.

The lawful basis of the data processing for the above purposes is as follows:

- establishment, execution and eventual termination of the contract or agreement between you and the Company as well as in the obligations to the same contract or agreement related and/or directly and/or indirectly arising therefrom (article 6 paragraph 1 lett. b) of the GDPR);
- for the communication to addresses and/or third parties involved in the management of the contract, the legitimate interest of the Controller (Article 6 paragraph 1 lett. f) GDPR) or third parties and addressees;
- to offer you similar goods and/or services (so-called "soft spam"), without prejudice to your right to object at any time, easily and free of charge, the processing is based on the Controller's legitimate interest (Article 6(1)(f) GDPR). Any objection you may raise will not affect the lawfulness of the processing carried out before such objection;
- for the legitimate interest of the Controller in defending against legal claims, as outlined in Article 6 paragraph 1 lett. f) of the GDPR. The legitimate interest here is to establish, exercise, or defend legal claims.

3. Mandatory or optional nature of providing personal data and consequences of a refusal

Personal data acquired by the Controller is necessary for the improvement of the contractual relationship and for the subsequent execution of the contractual relationship arising from the same. Therefore, your possible refusal to provide personal data may lead to the result that is not possible for the Controller to:

a) guarantee compliance with the existing regulatory provisions in civil, fiscal and tax matters, as well as the measures issued by the competent authorities;
b) ensure the proper management of the contractual relationship;
c) handle disputes, as well as exercise rights before the courts.

4. Data retention period

Personal data processed by the Data Controller is kept for the time necessary to complete the activities connected with the performance of the contract and for up to ten years after its conclusion or from when the rights depending on it can be enforced (in accordance with Art. 2935 and Art. 2946 of the Italian Civil Code); as well as for the fulfilment of obligations (e.g. tax or financial obligations) that remain even after conclusion of the contract (Art. 2220 of the Italian Civil Code), processing and storing only the data necessary for these purposes.

This is without prejudice to any cases where the rights deriving from the contract must be enforced before the court; in these cases, personal data, only that necessary to this end, will be processed for the time strictly necessary.

Personal data processed by the Company for soft-spam purposes, based on what we reasonably believe to be your expectations, will be retained for up to ten years after the end of the contractual relationship or until you exercise your right to object to the processing.

5. Recipients of personal data

Your personal data may be made accessible to:

a) employees and collaborators of the Controller and/or employees and collaborators of other companies of the KME Group, in their capacity as persons authorized to process and / or system administrators;
b) authorized representatives, companies, consultants, self-employed professionals who provide services functional to the purposes, with particular but not exclusive regard to technological, accounting, administrative, legal, fiscal and financial matters;
c) subjects to which is entrusted the service of maintenance and development of our computer system, for the time strictly necessary to the execution of the services.

With specific reference to subjects, companies, associations or professional firms that lend services or activities of assistance and consultancy or provide services to the Company, they will be appointed, by the Controller, as data processors within the meaning of Article 28 of the GDPR, by means of a dedicated appointment, indicating the processing methods and the measures required for the fulfilment and storage of the Controller's obligations.

6. Data transfer

The management and storage of personal data will take place on servers located within the European Union and operated by the Controller and/or by third-party companies duly appointed as Data Processors.

However, on a wholly occasional and incidental basis, certain data may be transferred to third countries (outside the EEA), particularly the United States, exclusively for technical requirements relating to maintenance, system management or specialist support.

In such cases, the transfer will be carried out in compliance with the conditions laid down in Articles 44 et seq. of the GDPR, ensuring an adequate level of protection for personal data through:

- adequacy decisions adopted by the European Commission, where applicable;
- the use of standard contractual clauses approved by the European Commission; or
- where appropriate, additional technical, contractual and organisational measures designed to ensure a level of protection essentially equivalent to that provided within the European Union.

7. Data subject rights

Your rights pursuant to articles 15-22 GDPR encompass the following:

- Right to access
- Right to rectification
- Right to erasure
- Right to restriction of processing

Right of objection in individual cases:
You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, which is based on Art. 6 para. 1 subparagraph 1 f) GDPR (purposes of the legitimate interests).

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the establishment, exercise or defence of legal claims.

At any time and free of charge, with no particular formalities for your request, you can:

- obtain confirmation of the data processing performed by the Controller;
- access your personal data and know their origin (when the data is not obtained from you directly), the purposes and aims of the processing, the data of the subjects to which it will be disclosed, the time for which your data will be kept or the criteria useful to determining this;
- update or rectify your personal data so as to ensure that it is always exact and accurate;
- erase your personal data from back-up and other databases and/or archives of the Controller if, amongst other situations, it is no longer necessary for the purpose of the processing or if this is assumed to be unlawful and as long as the legal conditions are met; and in any case if processing is not justified by another equally legitimate reason;
- limit the processing of your personal data in some circumstances, for example where you have challenged its exactness, for the period necessary to the Controller to verify its accuracy. You must be informed, in time, also of when the suspension period has expired or the cause for the limitation to processing ceased applying and, therefore, said limitation has been revoked.

The Controller must proceed in this sense without delay and in any case at the latest within a month of receiving your request. The terms may be extended by two months, if necessary, considering the complexity and number of requests received by the Controller. In these cases, the Controller shall, within a month of your request, inform you and make you aware of the reasons for the extension.

You can exercise your right:

- sending an e-mail to privacy@kme.com or a PEC to aziendametallilaminatispa@arubapec.it;
- contacting the DPO at dpo.aziendametallilaminatispa@kme.com;
- sending a written request to the Data Controller's registered office.

In addition, it is always possible to submit a complaint to the competent Supervisory Authority (art. 77 GDPR).