

PRIVACY POLICY

(art. 13 Regulation (EU) 2016/679 and Italian Legislative Decree 196/03
as amended and integrated from time to time)

Dear User,

You will find in this notice fully information regarding how Gefran processes your personal data regarding vulnerability reports submitted via the Coordinated Vulnerability Disclosure form in accordance with the Cyber Resilience Act. This notice is provided in accordance with the Regulation (EU) 2016/679 ("Regulation" or "GDPR") and reflects our commitment towards the protection of your personal data.

Data controller

The data controller is the Company Gefran S.p.A. ("Gefran" or the "Company"), headquartered in Provaglio d'Iseo (BS) via Sebina 74, 25050, pec gefran@legalmail.it.

Types of personal data

Gefran collects and processes only the data strictly necessary for the purposes pursued by the data processing activities set out hereafter.

Personal data may be provided voluntarily. We will always specify which personal data are required, for example by means of an asterisk (*), and the consequences of failing to provide them, for example the inability to fulfil a request, or the inability not to be publicly recognized as the Reporter of a vulnerability pursuant to the dedicated procedure.

The Reporter may submit a report anonymously. In such case, Gefran will process the technical information only and will not be able to update or request clarifications from the Reporter.

Purpose	Data	Legal basis	Retention period
Management of vulnerability reports and CRA compliance activities	identification data, contact details	consent	10 years
Disclosure of the Reporter's name in the Security Advisory	name, surname, organisation if any	consent	until withdrawal or removal of the page

*Reporter: who submits a vulnerability report through the Coordinated Vulnerability Disclosure form.

Personal data will be processed by the Company in accordance with GDPR and Italian law, including any provisions issued by the Supervisory Authority (the so called Garante per la protezione dei dati personali), where applicable, in any case, by ensuring compliance with the principles of correctness, lawfulness and transparency, protecting their confidentiality and related rights.

Personal data will be processed also using automated electronic methods, in addition to the manual ones, strictly necessary to the purpose of the processing and the data will be processed exclusively within the European Union. Appropriate security measures are observed to prevent the loss of data, illegal or incorrect use and unauthorized access.

Data will be retained for the time strictly necessary to achieve the purposes for which they were collected.

Legal basis of the processing

The data are processed by the Data Controller for specific purposes only, and where they are supported by an adequate legal basis. The legal basis used depends on the specific purpose for which the personal data is processed. For the purposes of the processing of personal data referred to in this policy, the legal basis used is:

- **Consent** when we ask for the specific consent of the user before processing certain personal information for specific purposes. Users may revoke their consent at any time by contacting the Data Controller, and in such a case, we will cease to process your information for that purpose.

Dissemination and disclosure

The Reporter's personal data will not be disseminated or disclosed to third parties unless the Reporter expressly asks for this and by giving consent through the dedicated form.

Without prejudice to the duty of disclosure to fulfil any public authority order or to abide by legal obligations, the personal data may be brought to the attention of Gefran's employees and processed by them; such personnel is formally appointed and authorized to process and receive opportune operational instructions in this regard. Furthermore, the data may be processed by external companies which Gefran may make use of in relation to the

GEFRAN SPA

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AEE: IT18080000010658

management of the contractual relationship with customers or for its own organizational needs and its activities.

Rights of Data Subjects

In accordance with the provisions of Article 13 of the GDPR, the subjects to whom the personal data refer have the right at any time to:

- **Access** (Article 15 GDPR): to obtain confirmation that personal data are being processed or not and, if so, to obtain access to the personal data and information concerning the processing, to know their content and origin and, where it does not violate the rights and freedoms of third individuals, to obtain a copy;
- **Correction** (Art. 16 GDPR): verify its accuracy or request its correction without unjustified delay and the integration or updating of incomplete personal data, also by providing a supplementary statement;
- **Deletion** (Art. 17 GDPR): to obtain the deletion of personal data without undue delay, in the cases provided for by the GDPR, or the transformation into anonymous form or the blocking of data processed in violation of the law; subject to any applicable exceptions, requests for the deletion of data are in fact subject to existing legal and record-keeping obligations required by law or regulations;
- **Restriction of processing** (Art. 18 GDPR): obtain the restriction of personal data processing, in cases provided for in the above-mentioned article of the GDPR;
- **Opposition** (Art. 21 GDPR): to oppose at any time, for legitimate reasons, the processing of personal data, including the profiling;
- **Withdrawal**: to withdraw consent, where the data processing is based on the consent; any withdrawal of consent to the processing does not affect the lawfulness of the processing based on the consent given before the withdrawal;
- **Data portability** (Art. 20 GDPR): to receive in a structured, commonly used and machine-readable format the personal data provided to a data controller and, where applicable, to transfer such data to another data controller;
- **Not be subject to an automated decision-making process** (Art. 22 GDPR): not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning or similarly significantly affecting the data subject.

To exercise the rights referred to in this notice it is possible to contact the Privacy Supervisory Body of the Company (the so called *Organismo di Supervisione Privacy*) at the addresses indicated above or by email at privacy@gefran.com.

The Data Subject is entitled to submit complaints to the Italian Authority for the protection of personal data, www.garanteprivacy.it.

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