

## INFORMATION REGARDING PROCESSING OF PERSONAL DATA

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

### 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](mailto:gefran@legalmail.it).

### Types of personal data

The data provided by You and concerning the personnel that You have assigned to the performance and management of the agreements (hereinafter the "Data Subjects"), including name, surname, contact data, e-mail addresses, positions where relevant, will be processed by the Company in accordance with the Regulation (EU) 2016/679 and with local laws, including any possible decisions issued by the Supervisory Authority, as applicable, and, according to accuracy, lawfulness and transparency principles, preserving their confidentiality and their related rights.

### Processing Methods

The personal data of the Data Subjects will be processed by the Company and by its personnel using electronic automated methods, in addition to the manual ones, if 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, unless such access is required by the applicable laws or by ensuring restoration of access to data after material or technical accidents).

Personal data of the Data Subjects may be processed using video surveillance instruments placed in the access/exit area and inside the premises, should the Data Subject visit the Company premises, according to the information notice for data processing for video surveillance purposes, available in our premises.

### Purposes and legal basis of the processing

The data of the Data Subjects are processed in for: the execution of commercial or professional purposes, to abide by legal and regulatory obligations, for registering customers into the Company's management system, for the administrative management of the agreements including for handling of invoices.

For the abovementioned purposes your consent is not required since the Company is authorized to avail itself of the reliefs available under letter b), c) of article 6.1, of the Regulation (EU) 2016/679 (i.e. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract; and processing is necessary for compliance with a legal obligation to which the controller is subject).

### Storage of data

The data will be maintained for the time strictly necessary in order to provide the requested services, without prejudice to the obligations provided for by the law.

Any withdrawal of the consent to the treatment does not affect the lawfulness of the processing based on the consent given before the withdrawing.

### Disclosure, dissemination and transfer of data

Personal data shall not be disseminated.

#### GEFRAN SPA

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Italy

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Fax +39 030 9839063  
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[info@gefran.com](mailto:info@gefran.com)

Cap. Soc. € 14.400.000 i.v.  
Reg. Imprese Brescia  
03032420170  
R.E.A. 313074 BS  
Mecc. BS 016227

C.F. 03032420170  
P.IVA (TVA-VAT-MWS)  
IT03032420170  
n. iscrizione Registro  
AEE: IT18080000010658

Without prejudice to the duty of disclosure in order to fulfil any legal or contractual obligations, the data may be disclosed to tax or legal consultants, to Company's collaborators, to the banks, to public entities as well as to those persons that are authorized by the laws to receive such data, if required, to Italian or foreign judicial or other public authorities for the fulfilment of legal obligations, or for the performance of the obligations arising from an agreement, including for the purposes of defence before the Courts. Such entities act as independent data controllers. Contact details may also be disclosed occasionally and for single reasons, to other customers and/or suppliers of the Company, including - without limitation - if it becomes necessary to collaborate with any of such persons for the performance of the contractual obligation. In order to perform certain services implying the need of personal data processing, the Company may also avail of third parties, including in respect of the service of substitutive filing. These companies shall operate as external data processors in compliance with specific and adequate directions concerning the processing methods and safety measures as specified in specific contractual documents.

The data may be disclosed to other companies belonging to the Group, including subsidiaries and affiliates, with registered office inside and outside the European Union (the updated list is available on Gefran website), if necessary for internal administration purposes and the coordination of the group, or if such companies need to cooperate for the performance of the contract. In this case, with reference to transfer the data to countries located outside the European Union, the Company undertakes to ensure a level of protection and preservation.

### Rights of the Data Subjects

The Data Subjects have the rights provided by the Regulation (EU) 2016/679, including among the others:

- obtain confirmation of the existence of such data and to know its content and origin, to verify its accuracy or to request its integration or updating, or correction;
- request cancellation, anonymization, or to block data processing in violation of the law, as well as the right to data portability; and to oppose in any case, for legitimate reasons, to the processing;
- withdraw previously given consent, if any, without prejudice to the lawfulness of processing based on that consent.

In order to exercise the rights referred to in this statement it is possible to contact the Company at the address indicated above or email us at [privacy@gefran.com](mailto:privacy@gefran.com).

The Data Subjects are entitled to submit complaints to the Italian Authority for the protection of personal data, [www.garanteprivacy.it](http://www.garanteprivacy.it).

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