

Privacy policy

(in accordance with Art. 13 of Legislative Decree no. 196/2003 Privacy Code as well as Articles 13 and 14 of the EU General Data Protection Regulation no. 679/2016)

The Euromecc S.r.l. Unipersonale Owner of the processing of personal data in accordance with Articles 4 and 28 of Legislative Decree no. 196 of 30 June 2003 - Privacy Code (hereinafter, "Code") and Articles 4, no. 7) and 24 of EU Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data (hereinafter, "Regulation") informs pursuant to Art. 13 of the Code and 13 and 14 of the Regulation that it will proceed to process personal data referring to the Party/Company and the natural persons legally representing it for the purposes and in the manner indicated below.

Although the disclosure obligations are no longer in force with regard to the processing of personal data of legal persons (given the inapplicability of the Privacy Code and the Regulation, the latter in force as of 25 May 2018, to such processing), Euromecc S.r.l. Unipersonale is in any case obliged to provide information in accordance with the Privacy Code and to acquire certain mandatory consents where the data of the legal person are processed for marketing or profiling purposes (Garante Provv. 23 September 2012).

In any case, and for greater transparency, although not mandatory, Euromecc S.r.l. Unipersonale intends to provide the Party/Company with full information on the purposes and methods of personal data processing.

Processing of personal data shall mean any operation or set of operations which is performed upon personal data or sets of personal data, whether or not stored in a database, whether or not by automatic means, such as collection, recording, organisation, structuring storage, processing, selection, blocking, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, restriction, erasure or destruction.

Processing will be carried out manually (e.g. collection of paper forms) and electronically or otherwise with the aid of computerised or automated tools.

According to the rules of the Code and the Regulations, the processing carried out by Euromecc S.r.l. Unipersonale will be based on principles of correctness, lawfulness and transparency and protection of confidentiality.

Pursuant to Article 13 of the Code and Articles 13 and 14 of the Regulation, we therefore provide the following information.

1. Source of personal data.

The personal data subject to processing may be collected in the context of the establishment or execution of business relationships relating to the submission of offers or the conclusion of sales or other contracts.

2. Primary purposes of processing.

Personal data will be processed by Euromecc S.r.l. Unipersonale in a primary manner exclusively for purposes strictly connected and instrumental to the fulfilment of obligations concerning business relations and in particular:

(a) legal fulfilments related to civil law, tax, accounting, etc;

- b) administrative management of the relationship and fulfilments in any case related to the economic activity of the company, including after-sales assistance and credit protection, market analysis and statistics;
- c) services and offers on new products, both by Euromecc S.r.l. Unipersonale and its subsidiaries.

3. Communication and dissemination of personal data for the pursuit of the primary purposes of the processing.

In all the cases illustrated above for the pursuit of the primary purposes Euromecc S.r.l. Unipersonale may communicate personal data externally to the following third parties to whom the communication is necessary for the fulfilment of obligations related to business relations.

To this end, personal data may be communicated and/or disseminated by Euromecc S.r.l. Unipersonale to the subjects indicated below:

- (a) companies controlled and participated by them;
- (b) companies bound by cooperation agreements;
- (c) its own sales network;
- (d) to banks and financial intermediaries, where they are engaged in the execution of their own payment orders;
- (e) auditing companies, debt collection companies;
- (f) to carriers for purposes related to the delivery of goods;
- (g) other operators involved in any way in economic and commercial management.

With reference to art. 13, paragraph 1, letter (d) of the Privacy Code and to the indication of the subjects or categories of subjects who may become aware of personal data in their capacity as managers or appointees, the following list is provided: internal workers and internal and external consultants of Euromecc S.r.l. Unipersonale in charge of administrative, secretarial, technical or other tasks.

4. Obligatory nature of consent.

Any refusal by the Party/Company to provide the data, in the cases referred to in Paragraph 2 above in which conferment is compulsory, has the consequence of making it impossible for Euromecc S.r.l. Unipersonale to fulfil its legal obligations related to civil, fiscal and accounting laws and its contractual obligations and, consequently, to continue the business relationship with the Party/Company.

5. Secondary purposes of the processing of personal data of a promotional, advertising and marketing nature in the broader sense.

Personal data collected as part of the commercial activity may also be processed by Euromecc S.r.l. Unipersonale, both in paper form (e.g. filling in forms, coupons and similar paper forms subsequently used electronically) and in automated/computerised form, for the purposes of commercial promotion, advertising communication, solicitation of purchasing behaviour, market research, surveys (including telephone, on-line or using forms), statistical processing (in identifiable form), other marketing sample research in the broad sense (including prize-giving events, games and competitions), hereinafter collectively referred to as "Processing for Marketing Purposes".

By giving consent to the Processing for Marketing Purposes the Party/Company specifically acknowledges such promotional, commercial and marketing purposes in the broadest sense of the term of the processing (including the consequent management and administrative activities) and expressly authorises Euromecc S.r.l. Unipersonale to proceed with such processing both in accordance with article 23 of the Privacy Code (where the means used for the Processing for Marketing Purposes are telephone with operator or other non-electronic, non-telematic means or not supported by automatic, electronic or telematic mechanisms and/or procedures) and in accordance with art. 130 of the Privacy Code (where the means used for the Processing for Marketing Purposes

are electronic mail, fax, sms, mms, automatic systems without operator intervention and the like, including electronic platforms and other telematic means) and - finally - pursuant to Art. 6, paragraph 1, letter (a) of the Regulation.

In accordance with the General Provision of the Privacy Guarantor of 15 May 2013 entitled "Consent to the Processing of Personal Data for the Purposes of 'Direct Marketing' through Traditional and Automated Contact Means", the attention of the Party/Company is specifically drawn to the fact that (a) any consent given for the sending of commercial and promotional communications, on the basis of Article 130(1) and (2) of the Code (i.e. through the use of electronic mail, fax, sms, mms, automated systems without operator intervention and the like, including electronic platforms and other telematic means) shall imply the receipt of such communications, not only through such automated contact methods, but also through traditional methods, such as paper mail or operator calls; (b) the Party/Company's right to object to the processing of its personal data for 'direct marketing' purposes through the above-mentioned automated contact methods shall in any event extend to the traditional ones and, even in this case, the possibility of exercising this right in part, as provided for in Section 7(4) of the Code, shall remain unaffected, both with respect to certain means and with respect to certain processing operations; (c) the possibility remains for the Party/Company that does not intend to give consent in the terms indicated above, to express the possible will to receive communications for the aforesaid Marketing Purposes exclusively through traditional methods of contact, where applicable. Such will may be exercised free of charge by sending a simple email to privacy@euomecc.com.

For the purposes of the principle of the fulfilment of privacy obligations for the Owner in compliance with the principles of simplification of the same fulfilments (art. 2 of the Code) and in accordance with the aforementioned General Provision of the Privacy Guarantor of 15 May 2013, Euomecc S.r.l. Unipersonale informs the Party/Company that the specific consent formulation available according to the consent collection procedure from time to time provided for will be unified and comprehensive and will refer to all possible means of marketing processing, pursuant to articles 23 and 130 of the Code, without prejudice to the possibility for the Party/Company to notify by email to privacy@euomecc.com a different will as to the use of certain means and not others for receiving, subject to consent, marketing communications.

Furthermore, again for the purposes of the principle of fulfilling privacy obligations for the owner in compliance with the principles of simplification of the same obligations (art. 2 of the Code), Euomecc S.r.l. Unipersonale informs the Party/Company that the specific consent formula will be unitary and overall and will also refer to all the different and possible marketing purposes explained herein (i.e. without multiplying the consent formulae for each distinct marketing purpose pursued by the data controller), without prejudice to the possibility for the Party/Company to notify by email to privacy@euomecc.com a different selective will as to the consent or refusal of consent for single marketing purposes.

In order to proceed with the Processing for Marketing Purposes, it is mandatory to acquire a specific, separate, express, documented, prior and entirely optional consent.

Consequently, where the Party/Company decides to give specific consent, it must be informed in advance and aware that the purposes of the processing pursued are of a specific commercial, advertising, promotional and marketing nature in the broad sense.

With a view to absolute transparency, Euomecc S.r.l. Unipersonale informs the Party/Company that the data will be collected and subsequently processed on the basis of specific consent:

- a) to send advertising and informative material (e.g. Newsletters), of a promotional or otherwise commercial nature, pursuant to Articles 23 and 130 of the Privacy Code;
- b) to carry out direct sales or placement activities for products or services of Euomecc S.r.l. Unipersonale;

- c) to send commercial information, carry out interactive commercial communications also pursuant to Article 58 of Legislative Decree 206/2005 through the use of email;
- (d) to prepare studies, research, market statistics;
- e) to send unsolicited commercial communications pursuant to Article 9 of Legislative Decree No. 70 of 9 April 2003 transposing the so-called Directive on Electronic Commerce 2000/31/EEC, which provides that unsolicited commercial communications must be immediately and unequivocally identifiable as such and contain an indication that the recipient of the message may object to receiving such communications in the future.

By thus giving optional consent, the Party/Company specifically acknowledges and authorises such further, possible secondary processing.

In any case, even where the Party/Company has given consent to authorise Euromecc S.r.l. Unipersonale to pursue all the purposes mentioned in points a) to e) above, the Party/Company will still be free at any time to revoke it, by sending a clear communication to that effect without any formality to the email privacy@euromecc.com. Following receipt of this opt-out request, Euromecc S.r.l. Unipersonale will promptly proceed to remove and cancel the data from the databases used for Processing for Marketing Purposes and to inform any third parties to whom the data has been communicated for the same purposes of cancellation. The mere receipt of the request for cancellation shall automatically be considered as confirmation of cancellation.

We specifically and separately inform you, as required by Article 21 of the Regulation, that if personal data are processed for direct marketing purposes, the Party/Company has the right to object at any time to the processing of personal data concerning it carried out for such purposes and that if the data subject objects to the processing for direct marketing purposes, the personal data may no longer be processed for such purposes.

6. Communication and dissemination of personal data for the pursuit of secondary processing purposes of a promotional, advertising and marketing nature in the broader sense.

For the same purposes as in letters a) to e) of Paragraph 5 above, Euromecc S.r.l. Unipersonale informs the Party/Company that the data may also be communicated to third party business partners. The consent to the Treatment for Marketing Purposes - where given by the Party/Company - does not cover the different and further marketing treatment represented by the communication of the data to third parties for the same purposes. In order to proceed to such external communication, it is mandatory to obtain from the Party/Company an additional, separate, documented, express and fully optional informed consent.

As in fact clarified in the General Provision of the Garante of 4 July 2013 containing the Guidelines for Countering Spam:

- (a) with regard to communication to third parties for marketing purposes in general, the communication or transfer of personal data to third parties for marketing purposes cannot be based on the acquisition of a single, generic consent from the data subjects for such purposes;
- (b) if the data controller intends to collect the personal data of data subjects also for the purpose of communicating them (or transferring them) to third parties for their promotional purposes, it must first issue them with an appropriate information notice that also identifies each of the third parties or, alternatively, indicates the categories (economic or product-related) to which the third parties belong;
- (c) it is necessary for the data controller to obtain specific consent for the communication (and/or transfer) of personal data to third parties for promotional purposes, as well as separate consent for the data controller to carry out promotional activities itself;
- d) should the data subject grant the aforesaid consent for communication to third parties, the latter will be able to carry out promotional activities with respect to the data subject by means of the

automated methods referred to in Article 130(1) and (2) of the Privacy Code without having to obtain a new consent for the promotional purpose.

In accordance with the aforementioned General Provision of the Garante of 4 July 2013, the third party recipients of the communication of the personal data of the interested parties for subsequent Processing for Marketing Purposes can be identified with reference to the following product or economic categories publishing, sports companies, suppliers of electronic communication goods and services, Internet service providers, communication agencies, companies providing insurance and financial services, companies in the food and catering sector, clothing, ICT hardware and software, banks and credit institutions, travel agencies, companies offering services in the tourism sector, companies offering services and goods for the person, including health goods and services.

Personal data processed for Marketing Purposes will not be disseminated.

In the event that the indication of the Party/Company's telephone number is requested - for the purposes illustrated in paragraphs 5 and 6 above - and the Party/Company has given its optional and specific consent to the processing of such personal data for the purposes of commercial promotion and marketing in the broadest sense, Euromecc S.r.l. Unipersonale informs the Party/Company that both Euromecc S.r.l. Unipersonale itself as well as any third parties may legally process the telephone users for marketing purposes even if they are registered in the Public Register of Oppositions, as they are processed from a source other than public telephone directories and covered by specific consent, except for the right to oppose the processing at a later date if the consent is formally revoked.

7. Optional nature of consent for the pursuit of the secondary purposes of the processing of personal data of a promotional, advertising and marketing nature in the broader sense.

We draw particular attention to the fact that the provision of personal data to Euromecc S.r.l. Unipersonale and the provision of both the consent to the Processing for Marketing Purposes and the separate consent to the communication to third parties for the Processing for Marketing Purposes for the purposes and in the manner illustrated above are absolutely optional and optional (and in any case revocable without formalities even after the provision) and failure to provide such data will not lead to consequences other than the impossibility for Euromecc S.r.l. Unipersonale and for any third party to proceed with the mentioned marketing treatments.

In the event of refusal to give marketing consent, there shall be no interference and/or consequences on the business relationship or on other existing relationships whose personal data processing falls within the primary purposes of the processing referred to in Paragraphs 2 and 3 of this Privacy Policy.

Exclusively with reference to the use of the email indicated by the Party/Company, we inform you that it will be possible for Euromecc S.r.l. Unipersonale to send (without the need to obtain specific consent, as provided for by article 130, paragraph 4 of the Privacy Code) informative and advertising material only if it relates exclusively to products and/or services similar to those for which the Party/Company originally gave marketing consent. In this particular case, the Party/Company's right to object to the processing at any time (by notifying its opt-out to the email privacy@euromecc.com) upon receipt remains unaffected. In any case the Party/Company, when sending any email communication made by Euromecc S.r.l. Unipersonale for the purposes envisaged herein, the Party/Company will be duly informed of the possibility to object to the processing at any time, easily and free of charge. This objection shall not have any consequence on the business relationship or any other relationship existing between the parties.

8. Processing of personal data for commercial profiling purposes.

It is possible that for marketing and service improvement purposes Euromecc S.r.l. Unipersonale proceeds to process so-called "profiling" data in order to evaluate certain aspects or to analyse or predict aspects regarding economic situation, preferences, interests, reliability, etc.

Profiling activities may concern 'individual' personal data or 'aggregated' personal data derived from detailed individual data. In order to clarify what 'profiling' consists of, reference can be made to the following parameters:

- data are structured and coordinated according to predefined parameters identified on a case-by-case basis, depending on business needs (regardless of marketing, contractual, administrative, etc. purposes);

- the source data, individually considered, may include personal information of a varied kind, but it is only after profiling (i.e. structuring according to pre-established parameters) that it is possible to infer further indications referable to each Party/Company concerned, further indications (i.e. the 'profile') that would not derive from the mere informative attitude of the data individually or separately considered.

In other words, profiling in the narrow sense can result in the availability of a wealth of information that goes well beyond the information considered individually and relating to each data subject; moreover, profiling in the narrow sense provides an added value given by the multiple correlations that can be established between the individual data collected, in order to derive additional useful information.

Fundamental elements of profiling will be:

- (a) the predetermination of the parameters for structuring the data individually considered;
- (b) the comparison, cross-referencing and correlation of these data with each other and the comparative analysis carried out on the basis of predefined parameters, also by means of automated processes (i.e. the cataloguing of individual data into clusters);
- (c) obtaining a profile through the preceding activities, which allows the identification of the Party/Company and additional analytical indications with respect to individual data and enables the dynamic creation of profiles.

The processing operations outlined above will hereinafter be collectively referred to as 'Profiling Processing'.

In order to proceed with Profiling Processing, it is mandatory to acquire specific, separate (also from the marketing consent referred to in paragraphs 5 and 6 above), express, documented, prior and entirely optional consent.

Consequently, where the Party/Company decides to give specific consent, it must be informed in advance and aware that the purposes of the processing pursued are of a specific commercial, advertising, promotional and marketing nature in a broad sense based on Profiling Processing.

With a view to absolute transparency, Euromecc S.r.l. Unipersonale therefore informs you that the data collected on the basis of specific consent may be subject to Profiling Processing for the same purposes set out in paragraph 5 of this information notice, while the scope of communication to third parties will possibly be the same as already explained for Marketing Processing in paragraph 6.

We draw particular attention to the fact that the provision of personal data to Euromecc S.r.l. Unipersonale and the provision of both the consent to the Processing of Profiling and the separate consent to the communication to third parties for the Processing of Profiling are absolutely optional and optional (and in any case revocable without formality even after the provision) and the failure to provide such data shall not determine consequences other than the impossibility for Euromecc S.r.l. Unipersonale and for any third party to proceed with the aforementioned processing.

In the event of refusal to consent to the Profiling Processing, there shall be no consequence or interference with the business relationship or other relationships existing between the parties whose

processing of personal data falls within the primary purposes of the processing referred to in Paragraphs 2 and 3 of this Privacy Policy.

9. Transfer of personal data to countries outside the European Union.

Please note that some personal data of the Party/Company and/or its legal representatives may be transferred to third countries or to third international organisations located outside the European Union in order to enable the pursuit of the primary purpose of the processing only.

From time to time, the prerequisite for the lawful transfer of personal data may be:

(a) the existence of adequacy decisions issued by the EU Commission for certain countries that guarantee the same level of protection for transferred data as that guaranteed in the EU (with the consequence that data may be transferred without constraints or consent, such as in the case of data transfer to Australia, Argentina, New Zealand, Uruguay, Israel, Hong Kong, Switzerland);

b) from the need to execute the obligations related to the established or establishing commercial relationship, or to execute commitments undertaken by Euromecc S.r.l. Unipersonale in the interest and in favour of the Party/Company, also of contractual type, or - finally - to pursue the legitimate interests of Euromecc S.r.l. Unipersonale

The Euromecc S.r.l. Unipersonale informs you that it is therefore not necessary to obtain the consent - at least of its legal representatives, given the inapplicability of the Code and the Regulations to the data of legal persons - to proceed with the processing represented by the transfer of personal data to third countries or to third international organisations located outside the European Union, on the basis of the assumptions of lawfulness of the processing illustrated above.

10. Data retention periods and other information.

The data will be kept for the time periods defined by the reference legislation, which are specified below in accordance with Article 13, paragraph 2, letter (a) of the Regulation: for the time necessary for the completion of the business relations existing between the parties and in any case no longer than ten years for documents and related data of a civil, accounting and tax nature as provided for by the laws in force.

With reference, on the other hand, to personal data subject to Processing for Marketing Purposes or Processing for Profiling Purposes, the same shall be retained in compliance with the principle of proportionality and in any case until the purposes of the processing have been pursued or until - if previously - the Party/Company revokes its specific consent.

11. Data Controller and Data Processors

The data controller is Euromecc S.r.l. Unipersonale with head office in Misterbianco (CT) Strada Statale 192 Km 79 Casella Postale 163, 95045.

The contact details of Euromecc S.r.l. Unipersonale and to communicate directly and effectively with it, including the e-mail address, are:

- tel. +39 331.1834741, +39 331.1834743, +39 095.7130011
- fax +39 095.7130115
- e-mail privacy@euromecc.com
- web www.euromecc.com

The name of the Data Processor (where appointed) is available at the company's registered office by informal request, including by email to privacy@euromecc.com.

12. Exercise of rights by the data subject.

Pursuant to Article 7 of the Privacy Code and pursuant to Articles 13, paragraph 2, letters (b) and (d), 15, 18, 19 and 21 of the Regulation, the Party and the Company's legal representatives only are hereby

informed that they are inapplicable to the Company's data as such, given the inapplicability of the Code and the Regulation:

- a) have the right to ask Euromecc S.r.l. Unipersonale, as Data Controller, for access to personal data, their rectification or cancellation or the restriction of their processing or to object to their processing, in the cases provided for;
- (b) have the right to lodge a complaint with the Garante per la protezione dei dati personali as a data subject, following the procedures and indications published on the Authority's official website at www.garanteprivacy.it;
- c) have the right to request and obtain from Euromecc S.r.l. Unipersonale - in cases where the legal basis of the processing is a contract or consent, and the processing is carried out by automated means - the personal data in a structured and machine-readable format, also for the purpose of communicating such data to another data controller (so-called right to data portability);
- d) any rectification or cancellation or restriction of processing carried out at the request of the data subject - unless this proves impossible or involves a disproportionate effort - shall be communicated by Euromecc S.r.l. Unipersonale to each of the recipients to whom the personal data have been transmitted. Euromecc S.r.l. Unipersonale may communicate these recipients to the interested party should the latter so request.

The exercise of rights is not subject to any formal constraints and is free of charge. The address for the exercise of rights is: privacy@euromecc.com.

For your convenience, Article 7 of the Privacy Code is reproduced in full below, while Articles 15 to 23 of the Regulation can be found at this link: <http://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679&from=IT>.

Article 7 (Right of access to personal data and other rights)

1. The data subject shall have the right to obtain confirmation as to whether or not personal data concerning him/her exist, even if not yet recorded, and communication of such data in intelligible form.
2. The person concerned has the right to be informed:
 - (a) the origin of the personal data;
 - (b) the purposes and methods of processing;
 - (c) the logic applied in the event of processing by electronic means;
 - (d) the identification details of the holder, the persons responsible and the representative designated pursuant to Article 5(2);
 - e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representative in the territory of the State, as managers or appointees.
3. The data subject has the right to obtain:
 - (a) the updating, rectification or, where interested therein, the integration of data;
 - b) the deletion, transformation into anonymous form or blocking of data processed in breach of the law, including data whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed;
 - c) certification that the operations referred to in points a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, unless this proves impossible or involves a manifestly disproportionate effort compared to the right protected.
4. The data subject has the right to object, in whole or in part:

- a) for legitimate reasons to process personal data concerning him/her, even if pertinent to the purpose of collection;
- b) the processing of personal data concerning him/her for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.