

## CUSTOMER PRIVACY POLICY

### PRIVACY POLICY PURSUANT TO ART. 13 OF REGULATION EU 2016/679

#### 1. Introduction

For Sammontana S.p.A., your privacy and the security of your personal data are particularly important. For this reason, we collect and process them with the utmost care and attention, adopting organisational and technical measures.

Sammontana S.p.A. (as defined below) provides this Privacy Policy to its Customers in accordance with Regulation EU 2016/679 on personal data protection (the "Regulation").

#### 2. Controller

The Data Controller is Sammontana S.p.A. (hereafter also "Sammontana"), based in Empoli (FI), 50053, Via Tosco Romagnola, no. 56, Tax Code and VAT no. 03957900487; Tel.: 0571 7076, Fax: 0571 707447, E-mail: [privacy@sammontana.it](mailto:privacy@sammontana.it); Certified email: [sammontana@legalmail.it](mailto:sammontana@legalmail.it).

#### 3. Type of personal data processed

In accordance with this Privacy Policy, personal data means personal and contact information such as, by way of example and without limitation, name, surname, address, telephone number, email address (hereafter known jointly as "Personal Data" or just "Data") relating to natural persons (hereafter "Data Subjects"), processed by Sammontana for the establishment, performance and correct management of the contractual relationship established with its Customers (hereafter, the "Contract")

#### 4. Purpose and legal basis of Processing

Sammontana processes the Data of the Data Subjects manually or using electronic tools, for the following purposes:

	Purpose of processing	Legal basis of processing
A	To perform the Contract between Sammontana and the Customer.	Processing implemented for this purpose is necessary to perform the Contract between Sammontana and the Client. It does not require specific consent from the data subject [Art. 6 par. 1 letter b) of the Regulation].
B	To exercise the rights of Sammontana even in judicial venues.	Processing implemented for this purpose is necessary to pursue the legitimate interest of the Controller in establishing, exercising or defending legal claims. It does not require specific consent from the data subject [Art. 6 par. 1 letter f) of the Regulation].
C	To comply with obligations deriving from the applicable legislation, therein including sending communications to the competent Authorities and to the supervisory bodies and complying with requests originating from the same.	Processing implemented for this purpose is necessary to comply with a legal obligation to which the Controller is subject. It does not require specific consent from the data subject [Art. 6 par. 1 letter c) of the Regulation].

#### 5. Nature of provision of Data and consequences of any refusal

The provision of Personal Data is necessary to achieve the purposes listed above. Any refusal to provide them, in whole or in part, may involve the lack of finalisation or maintenance of the Contract.

#### 6. Recipients/categories of recipients of the Personal Data

## CUSTOMER PRIVACY POLICY

Your Personal Data are processed by Sammontana personnel authorised in accordance with Art. 4, par. 1, no. 10) and 29 of the Regulation, instructed in that sense by the Controller, exclusively in relation to the duties performed and the purposes indicated in point 4.

Entities used by Sammontana to carry out its activities, which offer a suitable guarantee of compliance with the rules on Personal Data Processing, may also come to know of your Personal Data, in the capacity of external Processors in accordance with Art. 28 of the Regulation.

Those entities may belong to the following categories: legal, administrative and tax advisors which assist Sammontana in carrying out its activities; external entities which perform specific assignments on behalf of the Company for corporate, accounting and tax fulfilments; financial and insurance operators; internet providers; cloud or IT service providers; banks for the management of receipts and payments deriving from the performance of the Contract; sub-suppliers/subcontractors engaged in activities related to the performance of the Contract with the Controller; public bodies and/or judicial and/or supervisory authorities, if they so request. A specific and updated list of those entities is available from the office of the Controller and can be consulted at the request of the Data Subject.

The Personal Data may also be communicated to public bodies in fulfilment of obligations envisaged by law or regulations and to entities to which the right to access your Personal Data is granted by provisions of law or regulations (e.g. Finance Police, Police Forces, Local Public Safety Authorities, etc.) to ascertain and prosecute unlawful behaviours, and to prevent and safeguard against threats to public safety.

Your Personal Data may also be sent to third parties in the case of mergers, acquisitions, sales of businesses or business branches and other extraordinary operations, as well as to anyone who is the legitimate recipient of communications envisaged by the rules of law or regulations. In coherence with the pursuit of the processing purposes indicated above, your Personal Data may also be communicated to other companies of the Group to which Sammontana S.p.A. belongs, which, established within the European Union, will process your Personal Data in respect of the Regulation.

Finally, your Data may be sent to the judicial or administrative authorities to allow Sammontana to exercise or protect its legal rights or those of third parties or, in any case, for reasons connected to the protection of the rights and freedoms of others.

Your Personal Data will not be disseminated in any circumstance.

### **7. Data storage period**

We inform you that your Data will be stored for a limited period of time, which varies depending on the type of processing activity and the specific purposes of the same, as explained below:

- Personal Data processed to perform the Contract (point 4, letter A above): they may be stored for a maximum period of 10 (ten) years from the termination of the Contract;
- Personal Data processed in order to manage any judicial and/or extrajudicial disputes (point 4, letter B above): they will be stored for the period necessary to bring those disputes to an end;
- Personal Data processed for the purpose of complying with obligations envisaged by European and national legislation (point 4, letter C above): they will be stored for the periods imposed by the legislation.

At the end of those periods, your Data will be erased or will be made anonymous on a final and irreversible basis so that they are no longer attributable to the identity of the Data Subject.

### **8. Your rights**

We inform you that you are entitled to exercise the following rights in relation to the Personal Data subject to this privacy policy, as envisaged and guaranteed by the Regulation:

## CUSTOMER PRIVACY POLICY

- **Right of access and rectification** (Articles 15 and 16 of the Regulation): you have the right to access your Personal Data and to ask for the same to be corrected, modified or supplemented. If you wish, we will provide you with a copy of your Data in our possession.
- **Right to erasure of Data** (Art. 17 of the Regulation): in the cases envisaged by existing legislation, you may request the erasure of your Personal Data. Having received and analysed your request, we will stop the processing and erase your Personal Data if the request is considered legitimate.
- **Right to restriction of processing** (Art. 18 of the Regulation): you have the right to request the restriction of processing of your Personal Data in the case of ascertained inaccuracy of the same or unlawful processing.
- **Right to Data portability** (Art. 20 of the Regulation): you have the right to ask to obtain your Personal Data, from the Data Controller, in order to transmit them to another controller or to have them transmitted to another controller, in the cases envisaged by the cited article.
- **Right to object** (Art. 21 of the Regulation): you have the right to object at any time to the processing of your Personal Data carried out on the basis of our legitimate interest, explaining to us the reasons that justify your request; Sammontana will refrain from any further processing of your Data, except if Sammontana demonstrates the existence of compelling legitimate interests to carry on the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- **Right to lodge a complaint** (Art. 77 of the Regulation): without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the competent data protection supervisory authority, if you consider that the processing of your personal data infringes the legislation in force, by the methods and in respect of the terms indicated on the website of the *Garante per la protezione dei Dati Personali* (<http://www.garanteprivacy.it>).

At any time, you may exercise your rights, with reference to the specific processing of your Personal Data by Sammontana, by contacting the Controller using the details indicated in point 2 or using the form made available on the website of the Data Protection Supervisory Authority (Autorità Garante per la protezione dei Dati Personali) (<https://www.garanteprivacy.it>).

Further information about your rights can be obtained by requesting from the Controller the full extract of the articles cited above.

### 9. Security measures

Sammontana adopts security measures with a view to safeguarding the confidentiality, integrity, completeness and availability of your Personal Data. Technical, logistic and organisational measures are developed with a view to preventing damages, losses, even accidental, alterations, improper or unauthorised use of the Personal Data processed.

Data Controller

SAMMONTANA S.P.A.

The Customer declares to have received, read and understood this privacy policy provided in accordance with Regulation 2016/679.

Signed

---