

INFORMATION PURSUANT TO ART. 13 OF EUROPEAN REGULATION NO. 2016/679 ON THE PROTECTION OF PERSONAL DATA

1. Introduction

Pursuant to Article 13 of European Regulation No. 2016/679 (hereinafter, the '**Privacy Regulation**') Tecnosystemi S.p.A. Società Benefit (VAT No. 02535780247), with registered office in Via dell'Industria 2/4, Vittorio Veneto TV, e-mail info@tecnosystemi.com (hereinafter, the '**Company**'), as Data Controller of personal data already communicated or to be communicated in the future and at which personal data are or will be collected, wishes to inform you that your data may be processed, in compliance with the above-mentioned legislation, by the Company in relation to pre-contractual and/or contractual relationships with you or those that may be entered into in the future.

2. Source of personal data

Personal data acquired or to be acquired in relation to contractual or pre-contractual relationships is collected directly from the data subject. All personal data collected is processed in compliance with current legislation and, in any case, with due confidentiality.

3. Purpose of processing and legal basis for processing

The collection or processing of personal data is carried out for the following purposes:

(i) to adequately fulfil the obligations related to the Company's economic activity and, in particular, for:

- the performance of pre-contractual activities and the acquisition of preliminary information for the purpose of entering into a contract;
- managing the contractual relationship and all administrative, operational, managerial and accounting activities relating to the contract (order management, invoicing, supplier reliability checks, after-sales assistance and support, etc.);
- managing disputes, contractual breaches, warnings, transactions, arbitrations, legal disputes, etc.;
- fulfilment of obligations under laws, regulations, EU regulations and provisions issued by public authorities.

With reference to the purposes referred to in paragraph (i) above, the provision of personal data is mandatory and constitutes a necessary requirement for the establishment, management and execution of the contractual relationship; in fact, failure to provide such data will make it impossible to receive the service requested under the contract and, therefore, the legal basis for the processing is the fulfilment of pre-contractual and/or contractual and legal obligations related to the relationship established with the Company, pursuant to Article 6, paragraph 1, letters b) and c) of the Privacy Regulation.

(ii) updates on promotional and commercial initiatives, through the sending of advertising and/or promotional material by e-mail (hereinafter referred to as '**Marketing**').

With reference to the purpose referred to in paragraph (ii) above, the provision of data is optional and failure to give consent will only result in the inability to receive Marketing. The legal basis for the processing is the consent given by the Customer pursuant to Article 6, paragraph 1, letter a).

4. Methods of processing

Personal data will be processed lawfully and fairly and in any case in compliance with the aforementioned legislation, using tools that guarantee security and confidentiality, and may also be processed using IT tools designed to store, manage and transmit the data.

The processing will be carried out mainly by the Company's internal organisation, under the direction and control of the relevant company departments and for the purposes indicated above.

5. Duration of processing

In accordance with Article 5, paragraph 1, letter e) of the Privacy Regulation, the personal data being processed will be stored:

a) with reference to Article 3, paragraph (i), for the time strictly necessary with regard to the contractual relationship, and therefore for the entire duration of the same. After the termination of the contractual relationship:

- the data necessary for the fulfilment of legal and fiscal obligations will be stored for a further 10 years;
- the data necessary for any legal defence will be stored for the entire duration of the proceedings, until the judgement becomes final;
- the data necessary for communications to independent supervisory and judicial authorities will be stored for a period of 5 years, after which the need for further storage will be assessed if required by the aforementioned authorities.

Following termination of the relationship, data other than that necessary for the purposes referred to in the preceding points will be immediately deleted.

For pre-contractual purposes only, data will be processed for as long as necessary for the duration of pre-contractual negotiations, up to a maximum of 24 months, except in the event of legal defence in the event of disputes and/or pre-litigation activities. In the latter case, the necessary data will be retained for the entire duration of the proceedings, until the judgment becomes final.

b) with reference to Article 3(ii), the data necessary for sending marketing communications will be processed until the data subject exercises their right to unsubscribe from the service.

6. Recipients of personal data

Without prejudice to communications made in compliance with a legal obligation, regulation or EU legislation, the communication, including through simple consultation or provision of personal data concerning you, may be made to the following subjects:

- entities, supervisory bodies, public authorities or institutions;
- natural or legal persons providing specific services, such as, by way of example and without limitation, data processing, logistics and postal services, customer satisfaction surveys,

- legal, administrative, tax and/or accounting advice, organisation of trade fairs and communication events, etc.;
- c) commercial intermediaries, banks and credit institutions, financial intermediation companies, natural or legal persons responsible for credit recovery, auditing and/or certification of financial statements and quality systems, independent collaborators of the Company, agents and informants, insurers and brokers, shippers, etc.

The subjects referred to in the preceding points operate as independent Data Controllers.

We assure you that, in any case, only personal data that is aggregated and anonymous, or personal data that is necessary and relevant to the purposes of the processing for which it is intended, will be transferred to the aforementioned parties.

The list of these third parties will be constantly updated and made available to the data subject upon request to the Company. Due to the existence of links with these parties via electronic, IT or correspondence means, personal data may be made available abroad, possibly even outside the EU countries, subject to the existence of the relevant authorisation or on the basis of standard contractual clauses. Personal data will not be disclosed in any case.

7. Rights of the Data Subject

You retain the right to exercise your rights of access to the references indicated in the introduction to personal data provided for in Article 15 of the Privacy Regulation and the rights provided for in Articles 16, 17, 18, 21 of the Privacy Regulation regarding rectification, erasure, restriction of processing and the right to object, within the limits of Article 2-undecies of the Privacy Code and in the manner established by Article 12 of the Privacy Regulation. To this end, a communication may be sent to the Data Controller's e-mail address.


8. Right to lodge a complaint pursuant to Article 77 of the GDPR

If our Company does not respond within the time limits set by the law or if the response to the exercise of your rights is not satisfactory, you may lodge a complaint with the Data Protection Authority at the following coordinates: website www.gpdp.it or www.garanteprivacy.it, email protocollo@gpdp.it, telephone switchboard: (+39) 06.69677.1.

9. Further information

Further information regarding the processing and communication of personal data may be requested from the Company.

The updated list of Data Processors, where appointed, is available from the Company.



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