

INFORMATION ON THE PROCESSING OF PERSONAL DATA
COLLECTED FROM THE DATA SUBJECT

**ACCORDING TO ARTICLE 13 OF EUROPEAN REGULATION 2016/679 (GDPR) AND
LEGISLATIVE DECREE NO. 196/2003, AS AMENDED BY LEGISLATIVE DECREE NO.
101/2018**

To better understand this notice, the Data Controller is the natural or legal person determining the purposes and means of processing personal data.

Personal data is information concerning an identified or identifiable natural or legal person, referred to as the "Data Subject".

Data, or so-called personal data, are those from which it is possible to detect racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data intended to uniquely identify a natural person and data concerning the health or sex life of the Data Subject.

This notice consists of No. 4 (four) pages.

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1. Personal data controller

STEELTRADE S.R.L., in the person of its legal representative pro tempore, with registered office in 29010 - Rottofreno, Cattagnina district (PC), via Abruzzo n. 26, VAT/P.I. 00404960338, certified email steeltrade.gdpr@pec.spt.it, in its capacity as Data Controller, informs you that -in accordance with the applicable national legislation and art. 13, Reg. UE 2016/679- your data will be processed as follows.

2. Type of data processed.

The data communicated directly by the Data Subject to the Controller are:

- a) for natural persons: name, surname, place and date of birth, tax code, address of residence and/or domicile and/or abode, e-mail and/or certified email address, fixed and/or mobile telephone numbers, bank details, unique code for electronic invoicing
- b) for sole proprietorships and legal entities, in addition to the data referred to in the preceding point: company name, registered office, tax code, VAT number, ATECO code, e-mail and/or certified email address, fixed and/or mobile telephone numbers, bank data, unique code for electronic invoicing
- c) for both categories of Interested Parties referred to in letters a) and b) above technical specifications relating to the project represented to the Controller to agree with the latter on the task to be performed.

The Data Controller reserves the right to integrate the personal data to be processed; in this case, the Data Controller will ask for the signature of a specific consent.

3. Purpose of processing and legal basis.

The Controller carries out data processing in the development of its activities and for the following purposes:

- a) drafting of the quotation;
- b) consultancy and design activities
- c) performance of the assignment conferred;
- d) sending of updated notices;
- e) fulfilment of tax and accounting obligations;
- f) telematic data transmission;
- g) invoicing.
- h) direct marketing: to send e-mail and/or SMS marketing communications, newsletters, advertising material,
- i) profiling for marketing purposes using decision-making processes that are not solely automated for the determination of preferences (this involves, for example, the filling in of forms that in any case suppose human intervention);
- j) research and market analysis involving human intervention.

For the purposes from letter a) to letter g), the data communication to the Data Controller is a requirement under Article 6, no. 1, letters a) and b) of the GDPR; therefore, the refusal of the data subject to the communication of personal data as per point no. 2) of this information notice, will make it impossible to establish and/or continue the relationship with the Data Controller.

Authorization to process data for the purposes referred to in points h), i) and j) is optional; the Data Subject is required to give express consent under Articles 6(a) and 22(2)(c) of the GDPR.

Authorization to process data for the purposes referred to in points h), i) and j) is revocable at any time and without charges to the Data Subject.

Refusal and/or revocation of using the data for the purposes referred to in points h), i) and j) shall not affect existing or future business relations with the Controller.

Without the prior consent of the Data Subject, personal data shall be processed for the fulfilment of contractual or social contact obligations, for the pursuit of a legitimate interest of the Data Controller (such as handling complaints and/or disputes, recovering debts, preventing unlawful activities, exercising the right of defense in court), for the fulfilment of tax, accounting and legal obligations.

4. Processing methods

The Controller processes personal data on computer and/or paper media and has adopted specific security measures to prevent their loss and illegal, incorrect, and unauthorized use.

5. Access, communication and disclosure of personal data to third parties.

Personal data will be processed, to the extent necessary, by the appropriately instructed and trained authorized personnel of the Data Controller, who may also operate in the division based in Tianjin

(China), as well as by the personnel of third parties who provide services to the Data Controller and process data on its behalf and on its instructions as authorized, appointed and/or responsible data processors, under Articles 28 and 29 of the GDPR.

Personal data may be made accessible and/or communicated to third parties only for the purposes in point no. 3) of this notice.

In the event of communication with third parties, the recipients may be:

- consultants and/or freelance professionals in individual or associated form;
- companies and/or public and/or private entities for which the communication of the data is mandatory and/or necessary for the proper performance of the requested activity and for compliance with legal obligations (by way of example, but not limited to, banks and credit institutions, social security and/or welfare institutions, Chambers of Commerce, Industry, Crafts and Agriculture, Inland Revenue, etc.)
- persons who carry out control, review and certification activities by the Data Controller, consultants and freelancers in the context of tax and legal assistance services, public bodies and administrations, and authorized parties.

6. Data retention period.

The Data Controller retains personal data for no more than 10 years from the end of the relationship with the Data Subject for the purposes established by law, including accounting and reporting, except as specified in the following paragraph.

For the purposes referred to in paragraph 3, letters h), i) and j), if the data subject has expressly consented to the processing, the Data Controller will keep the data until the data subject requests revocation and/or cancellation.

If the Interested Party—after the quotation has been viewed (if any)—does not intend to grant the assignment to the Data Controller, the latter will archive the quotation for 1 year and, once this period has elapsed, permanently delete it from any computer and/or paper support.

Should the Interested Party wish to exercise the right to the deletion of his/her data before the aforesaid period of 1 year, he/she may make a specific request to the following dedicated certified email address steeltrade.gdpr@pec.spt.it

7. Rights of the Data Subject.

The Data Subject may exercise, about the data processing described herein, the rights provided by the GDPR (Articles 15- 22), including:

- receive confirmation of the existence of the Data and access their content (access rights);
- update, modify and/or correct the Data (right of amendment);
- request the cancellation or limitation of the Data processed in violation of the law, including those whose retention is not necessary about the purposes for which the Data were collected or otherwise processed (right to be forgotten and right to limitation);
- oppose to the processing (right to opposition);
- file a complaint with the Supervisory Authority (Guarantor of personal data protection www.garanteprivacy.it) in case of violation of the regulations on the protection of personal data;

- receive a copy in electronic format of the Data concerning him as an interested party when such Data has been provided in the context of the contract and request that such Data be transmitted to another data controller (right to data portability);
- revoke consent at any time without affecting the lawfulness of the processing based on the consent given before the revocation;
- file a complaint with the guarantor to protect personal data, under art. 77 et seq. of the GDPR.

The Data Subject is invited to contact the Data Controller directly before turning to the Guarantor of personal data protection.

In this regard, it should be noted that the rights under Articles 15-22 of the GDPR cannot be exercised with a request to the Data Controller or with a complaint under Article 77 of the GDPR in accordance with the limitations outlined in Articles 2undecies and 2duodeces of Legislative Decree no. 196/2003, as amended by Legislative Decree no. 101/2018.

To exercise their rights, the Data Subject may contact the Data Controller by sending a communication to the certified email address steeltrade.gdpr@pec.spt.it

The Data Controller will provide an adequate response within one month of receiving the request; only in cases of severe complexity and a high number of requests can this deadline be extended by 2 (two) months.

8. Amendments to this notice.

This policy may be subject to amendments; therefore, it will be the Data Controller's responsibility to notify the Data Subject of any substantial updates.

9. Contacts.

In case of questions on processing your personal data by the Controller, you may send a communication to the certified email address steeltrade.gdpr@pec.spt.it.

Rottofreno, Cattagnina district, 22/04/2024


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