

Dear CUSTOMER

**INFORMATION PURSUANT TO ARTICLE 13 OF EU REGULATION 2016/679 ON THE
PROCESSING OF PERSONAL DATA**

Pursuant to Articles 12, 13 and 14 of the General Data Protection Regulation (EU) 2016/679 ("GDPR"), and in general in compliance with the transparency principle provided by the GDPR itself, our company provides the following information regarding the processing of personal data (i.e., any information relating to an identified or identifiable natural person), in relation to the conclusion and execution of the contract/order entered into with the Customer (also "the Data Subject").

1. **The Data Controller** is SEVEN S.r.l. Unipersonale - Tax Code / VAT No. 00544860281 - Via Dell'Industria, 2/C - 35012 Camposampiero, Padua / Italy Tel +39 049 8874518 - Fax +39 049 8874517 - privacy@sevensrl.it

2. **The processing of Personal Data** will be carried out both by manual and IT and telematic means in compliance with the applicable laws and the principles of fairness, lawfulness, transparency, relevance, completeness and non-excessiveness, accuracy, and with organizational and processing logics strictly related to the pursued purposes and in any case so as to guarantee the security, integrity and confidentiality of the processed data, in compliance with the organizational, physical and logical measures provided by the current provisions, which will be implemented and enhanced from time to time also in relation to technological development to ensure confidentiality, availability and integrity of the processed data. There are no automated decision-making processes.

3. Purposes of processing

The Personal Data collected will be processed for the purposes described below:

a) **execution of sales contracts (in all their phases, including pre-contractual ones) of components for industrial and milling suction systems for the transport of flour and semolina**; in relation to the processing of customer data for purposes strictly connected to the management of the relationship with the Customer, including formalities and administrative and accounting obligations (for example, acquisition of preliminary information prior to the conclusion of a contract; execution of operations based on obligations deriving from the concluded contract/order; for operational and management needs; for control needs on the performance execution; for verification of tax and social security compliance; for dispute management - contractual breaches; warnings; settlements; debt recovery; arbitrations; judicial disputes and other procedures for the settlement of any disputes also extrajudicially, etc.).

b) **Compliance with legal obligations** (both national and EU) and provisions issued by authorities legally entitled by law and supervisory and control bodies.

c) **Sending commercial proposals** (if the Data Subject does not express dissent) sending, through the provided e-mail addresses, communications relating to the direct sale of products or services similar to those already supplied, provided that the Data Subject, adequately informed, does not refuse such use, initially or on the occasion of subsequent communications.

The data processed are briefly:

- **identifying data of natural persons:** such as name and surname, dates of birth, residence, domicile, Tax Code, VAT number, bank details entered in the customer registry.
- **contact data** related to communications (via Internet, telephone, etc.), such as fixed or mobile phone numbers, e-mail addresses, provided at the time of contract conclusion or during the contract/order validity.
- **special categories of data:** not processed.
- **judicial data:** not processed.

4. Legal basis.

For the purpose referred to in letter A), the legal basis is the contractual obligations to which the Data Controller is subject or the legitimate interest of the latter (for example, the right to defense in case of dispute). Regarding the purpose referred to in letter B), "compliance with legal obligations or provisions of authorities", relevant data will be requested, if not already available as collected for purpose A), for the fulfillment of such obligations by the Data Controller, and failure to provide them could constitute a violation of the law. There is no obligation to provide data in the pre-contractual phase, but failure to provide them will make it impossible to conclude the contract/order while failure, partial or inaccurate provision of the same could make it impossible to fulfill contractual and legal obligations. While the processing referred to in letter C) may take place unless the Data Subject, adequately informed, refuses such use, initially or on the occasion of subsequent communications, as provided for by paragraph 4 of article 130 of Legislative Decree 196/2003 and subsequent amendments. Personal Data will be processed for a period equal to the minimum necessary, i.e., until the expiration of any pre-contractual and contractual relationships in place with the Data Controller, taking into account the legal prescription terms and in any case, **data will be kept** for no more than 10 years from the end of the relationship which coincide with civil law terms, except for the times necessary to protect the legitimate interests of the Data Controller. In any case, the principles of necessity, proportionality and non-excessiveness will apply. For the purposes referred to in letter C) of point 3 above, processing may last until consent is revoked and in any case no longer than two years from the termination of the contractual relationship.

5. Disclosure, transfer. Possible recipients or categories of recipients of the data

Disclosure: the Data Subject's personal data will not be disclosed.

Transfer: Personal Data will be processed within the territory of the European Union. In the event that, for technical and/or operational reasons, it becomes necessary to use subjects located outside the European Union, the transfer of Personal Data, limited to the performance of specific processing activities, will be regulated in accordance with Chapter V of the GDPR. All necessary precautions will be taken to ensure the full protection of Your Personal Data basing such transfer: (i) on adequacy decisions of third countries expressed by the European Commission; (ii) on adequate guarantees expressed by the third party recipient pursuant to Article 46 of the GDPR; (iii) on the adoption of binding corporate rules.

Recipients: The data provided will be processed exclusively by persons authorized to process and properly trained, as well as through data processors linked to the Data Controller by specific contract such as: Accounting Firm Other professionals (natural or legal persons) who, providing goods or services, operate on behalf of the Controller (external processors) Banks for collection management. It is understood that the data processed will be exclusively those necessary to achieve the specific purpose, so data managed through third parties will be limited to the specific purpose. Data may also be communicated to Public Entities, Police Forces or other Public and Private Subjects, but exclusively for the purpose of complying with legal obligations, regulations or EU legislation.

6. Respect of the Data Subject's rights: Articles 15, 16, 17, 18, 19, 20, 21, 22 and 77 of the GDPR.

The GDPR grants the Data Subject the exercise of the following rights with reference to the personal data concerning them (the brief description is indicative, reference is made to the GDPR, in particular Articles 15-22):

- a) access to personal data (the Data Subject will have the right to receive free information about the personal data held by the Data Controller and the related processing, as well as to obtain a copy in an accessible format);
- b) rectification of data (the Controller will proceed, upon the Data Subject's request, to correct or integrate the Data Subject's personal data - not evaluative elements - that are incorrect or inaccurate, including those that have become such because they are not updated);
- c) withdrawal of consent (if the processing is based on consent expressed by the Data Subject, which is not the case for the processing under this Information, the Data Subject may withdraw consent at any time without prejudice to the lawfulness of the processing carried out before the withdrawal);
- d) erasure of data (right to be forgotten) for example, when data are no longer necessary for the purposes for which they were collected or processed; have been unlawfully processed; must be erased to comply with a legal obligation; when the Data Subject has withdrawn consent, which is not the case for the processing under this Information, and there is no other legal basis for processing; the Data Subject objects, if conditions exist, to the processing pursuant to the following letter f);
- e) restriction of processing (in certain cases) contesting the accuracy of data, during the time necessary for verification; contesting the lawfulness of processing with opposition to erasure; need to use data for the Data Subject's defense rights, while they are no longer useful for processing; if there is opposition to processing, while necessary checks are carried out - data will be stored in a way that they can be restored, but meanwhile are not accessible by the Controller except in relation to the validity of the restriction request by the Data Subject, or with the Data Subject's consent or for the ascertainment, exercise or defense of a right in court or to protect the rights of another natural or legal person or for reasons of public interest of the Union or a Member State;
- f) opposition in whole or in part to processing for legitimate reasons (in whole or in part, for reasons related to the particular situation of the Data Subject, to processing based on legitimate interest);
- g) data portability (if processing is based on consent or contract and carried out with automated means, which is not the case for the processing under this Information, upon request, the Data Subject will receive in a structured, commonly used and machine-readable format the personal data concerning them and may transmit them to another Data Controller without hindrance from the Data Controller to whom they were provided and, if technically feasible, may obtain that such transmission be carried out directly by the latter);



SEVEN s.r.l. - Unipersonale
Via Dell'Industria, 2/C
35012 Camposampiero
PADOVA - ITALY
Tel +39 049 8874518
seven@sevensrl.it

h) lodging a complaint with the supervisory authority (Data Protection Authority – Privacy Authority). The Data Protection Authority can be contacted through the contacts indicated on the Authority's website "www.garanteprivacy.it".

For the exercise of rights or for any request or need related to this information, the Data Subject may contact the Data Controller at the e-mail address: privacy@sevensrl.it

The updated customer privacy information is available on the website at <https://www.sevensrl.it> in the "Privacy" section located at the bottom of the Homepage (footer).

The Data Controller
SEVEN S.r.l. - Unipersonale