

SEIPEE S.p.A.

Share Capital Euro 120.000,00 i.v. - Tax Code 00185010360 Company

Register Reg.Imp.Mo – R.E.A. n°152011

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Notice

Information on the processing of personal data pursuant to art. 13 Reg.to UE 2016/679

Data Subjects: clients and/or contacts at Customer companies.

SEIPEE S.p.A., in its capacity as Controller of the processing of your personal data, pursuant to and for the purposes of Reg.to UE 2016/679 hereinafter 'GDPR', hereby informs you that the aforementioned legislation provides protection for data subjects in relation to the processing of personal data and that such processing will be carried out in accordance with the principles of lawfulness, fairness, transparency and safeguarding of your privacy and your rights.

Your personal data will be processed in accordance with the legislative provisions of the aforementioned regulation and the confidentiality obligations provided therein.

During the indicated processing the Controller may operate on categories of common personal data, in detail: economic, commercial, financial and insurance activities, tax code and other personal identification numbers, name, address or other personal identification elements

Purposes and legal basis of the processing: in particular your data will be processed for the following purposes related to the implementation of obligations arising from legal requirements, pursuant to article 6, first paragraph, letter c), of the GDPR, such as:

- mandatory legal obligations in the fiscal and accounting fields;

- management of disputes;
- fulfilment of obligations provided for by applicable laws.

Your data will also be used for the following purposes related to the performance of measures connected to contractual or pre-contractual obligations pursuant to article 6, first paragraph, letter b), of the GDPR:

- after-sales assistance;
- Customer care;
- management of relationships during sales operations;
- management of the sales contract and related obligations, including pre-contractual activities and shipping;
- customer management;
- customer billing history.

Your data will also be used for the following purposes necessary for the pursuit of the Controller's legitimate interest pursuant to article 6, first paragraph, letter f), of the GDPR:

- marketing via electronic mail, in relation to services or products similar to those you have already purchased and, also through the sending of newsletters or invitations to events concerning such services or products. Furthermore, you may object to this processing purpose at the time of data collection or when any subsequent communication is sent, by using the link at the bottom of the message "Unsubscribe" or by sending a request to the Controller at privacy@seipee.it.

With regard to the purposes indicated above, where you are an employee-contact of the client-legal entity your data will be processed due to the necessity of interacting, through you, with the client-legal entity.

Processing methods. Your personal data may be processed as follows:

- by electronic computers using software systems managed by Third Parties;
- outsourcing of processing operations to third parties;
- in the case of consent given with regard to the marketing purpose related to products and/or services already purchased, automated contact methods (e.g. automated e-mail campaigns, SMS, automated telephone contact, instant messaging, social networks, etc.);
- with reference to the marketing purpose related to services or products similar to those you have already purchased, the Controller, in order to compare and possibly improve the results of communications, uses systems for sending newsletters and promotional

communications with reporting. Thanks to the reports the Controller may know, for example: the number of readers, of openings, of unique "clickers" and clicks; the detail on the activity of individual users; the number of pending users who have not yet confirmed the subscription; the detail of emails sent by date/time/minute; the detail of delivered and undelivered emails, of those forwarded; the list of unsubscribed users from the newsletter; who opened an email or clicked a single link; users with issues displaying the message; link tracking (that is the number of clicks made on the message links); click tracking (which links were clicked and by whom). All these data are used for the purpose of comparing and, if necessary, improving the results of the communications;

- manual processing by means of paper archives;
- processing by electronic means.

Each processing is carried out in compliance with the methods referred to in arts. 6, 32 of the GDPR and through the adoption of adequate security measures provided.

Your data will be processed exclusively by personnel expressly authorized by the Controller and, in particular, by the following categories of authorized personnel:

- General Management;
- Administration office;
- Commercial office.

Your personal data may be processed by third parties belonging, by way of example, to the following categories:

- Agents and/or representatives at Agencies for the execution of existing relationships;
- banks and credit institutions;
- consultants and freelance professionals, including in association;
- within the scope of public and/or private entities for which the communication of data is mandatory or necessary to comply with legal obligations or is in any case functional to the administration of the relationship;
- with reference to the marketing purpose related to services or products similar to those you have already purchased, external platform used for the management of commercial communications;
- external subjects necessary for the performance of the existing relationship (e.g. companies providing hardware or software assistance services or cloud services);
- forwarders, Carriers, owner-drivers, Poste, Logistics companies.

The subjects belonging to the categories listed above act, in some cases, as data processors specifically appointed by the Controller in compliance with article 28 GDPR, in other cases in full autonomy as separate controllers, it being understood that, in the latter case, the communication of your personal data to such autonomous controllers is carried out solely for the purpose of pursuing the purposes indicated in this privacy notice.

The list of such subjects is available upon request at the contact details indicated in this notice.

Disclosure: Your personal data will not be disclosed in any way.

Your personal data may also be transferred, limited to the above-mentioned purposes, to the following territories:

- for technical and organizational needs, with particular reference to the marketing purpose related to services or products similar to those you have already purchased, your data are transferred to territories belonging to the UE.

Retention Period. Please note that, in compliance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 of the GDPR, the retention period of your personal data is:

- with reference to the marketing purpose related to services or products similar to those you have already purchased, until you decide to unsubscribe from the service or object to the processing or exercise your right of revocation;
- established for a period of time not exceeding the achievement of the purposes for which they are collected and processed for the execution and performance of contractual purposes;
- established for a period of time not exceeding the achievement of the purposes for which they are collected and processed and in compliance with the mandatory time periods prescribed by law.

Controller:

the Controller of the data processing, pursuant to the Law, is SEIPEE S.p.A. (Via Viottolo Croce 1, 41011 Campogalliano (MO), P. IVA 00185010360, contactable at the following details: e-mail info@seippee.it, telephone +39 059 850108) represented by its pro tempore legal representative.

You have the right to obtain from the Controller the erasure (right to be forgotten), restriction, update, rectification, portability, objection to the processing of personal data concerning you and, in general, you may exercise all the rights provided for by arts. 15, 16, 17, 18, 19, 20, 21, 22 of

the GDPR by writing to privacy@seipee.it or by contacting the Controller at the company contact details provided in this document. You may also lodge a complaint with the competent supervisory authority if you believe that the processing of your data is contrary to the applicable legislation.

Reg.to UE 2016/679: Artt. 15, 16, 17, 18, 19, 20, 21, 22 - Data Subject Rights

1

The data subject has the right to obtain confirmation of the existence or not of personal data concerning them, even if not yet recorded, their communication in an intelligible form and the possibility of lodging a complaint with the Supervisory Authority.

2

The data subject has the right to obtain the indication of:

1. the origin of the personal data;
2. the purposes and methods of the processing;
3. the logic applied in the case of processing carried out with the aid of electronic instruments;
4. the identification details of the controller, of the processors and of the representative designated pursuant to article 5, paragraph 2;
5. 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 processors or as persons in charge.

3

The data subject has the right to obtain:

1. the updating, rectification or, when interested, the integration of the data;
2. the deletion, the transformation into anonymous form or the blocking of data processed unlawfully, including those whose retention is not necessary in relation to the purposes for which they were collected or subsequently processed;
3. a declaration that the operations referred to in letters a) and b) have been brought to the attention, also regarding their content, of those to whom the data have been communicated or disseminated, except where this requirement proves impossible or involves the use of means manifestly disproportionate to the protected right;
4. the portability of the data.

The data subject has the right to object, in whole or in part:

1. for legitimate reasons to the processing of personal data concerning them, even if relevant to the purpose of the collection;
2. to the processing of personal data concerning them for the purpose of sending advertising material or direct sales or for carrying out market research or commercial communication.