



Information on the processing of personal data provided through the App

Pursuant to Articles 13 and 14 of Regulation 2016/679/EU (hereinafter "GDPR"), RACCORDERIE METALLICHE S.P.A., with registered office in Campitello di Marcaria (MN), Strada Sabbionetana, 59 – 46010, in its capacity as "Data Controller" is committed to respecting and protecting the *privacy* of the Data Subject and wishes to guarantee the security of the processing of the data provided both by registering with the App and during navigation.

Origin, purpose, legal basis, and nature of the data processed

The processing of personal data, directly provided, is conducted by RACCORDERIE METALLICHE S.P.A. to process the requests made by filling in the registration on the application. It is also possible that the personal data of third parties communicated by the Data Subject to RACCORDERIE METALLICHE S.P.A. may be processed. With respect to this assumption, it acts as an independent data controller and IT assumes all legal obligations and responsibilities, ensuring that it has complied with the provisions of the law in order to make their processing by RACCORDERIE METALLICHE S.P.A. legitimate, relieving it of any dispute, claim and/or claim for compensation for damage that may come to RACCORDERIE METALLICHE S.P.A. by interested third parties.

In compliance with current legislation on the protection of personal data, the data will be stored, collected, and processed by RACCORDERIE METALLICHE S.P.A. for the following purposes:

- a) Registration of the Data Subject to the Application, to view the online catalogue.
- b) Fulfilment of the requests made by the Data Subject by completing the form.
- c) Fulfilment of any legal obligations related to the provision of the requested service/service.
- d) Forwarding, directly or through third party providers of marketing and communication services, newsletters, and communications for direct marketing purposes, through email, SMS or through the contact provided by the Data Subject, for services provided by RACCORDERIE METALLICHE SPA pursuant to art. 130 c. 1 and 2 of Law no. 196/03 (hereinafter referred to as the "Code").

The legal bases of the processing for the above purposes are Articles 6.1.b) and 6.1.c) of the GDPR, i.e. respectively the execution of a contract and the fulfilment of a legal obligation.

The provision of data for the above purposes is necessary to allow RACCORDERIE METALLICHE S.P.A. to execute and/or stipulate the contract and provide the services requested.

The legal basis for the processing of personal data for the purpose d) is art. 6.1.a) of the GDPR, i.e. specific consent; RACCORDERIE METALLICHE S.P.A. may collect a single consent for the marketing purposes described

RACCORDERIE METALLICHE S.P.A.
Strada Sabbionetana, 59
46010 Campitello di Marcaria (MN)
Email info@racmet.com | PEC
raccorderie.metalliche@pec-mail.it | Tel.
037696001
P. IVA 01591820202 | Cod. Fisc.
02066990173



herein, pursuant to the General Provision of the Guarantor for the protection of personal data "Guidelines on promotional activities and fight against spam" dating back to July 4, 2013. Consent to the use of the data for marketing purposes is optional and the Data Subject may decide to object to the processing of the data for these purposes or to withdraw consent at any time, following the instructions in the "Rights of the Data Subject" section of this Information Notice.

For the processing carried out for the purposes of sending its own advertising material or direct sales or for carrying out its own market research or commercial communications in relation to products or services similar to those already used by the Client, RACCORDERIE METALLICHE S.P.A. may use e-mail addresses or personal data in accordance with and within the limits allowed by Article 130, paragraph 4 of the Code and the provision of the Guarantor Authority for the protection of personal data of 19 June 2008, even in the absence of an open consent (communications relating to goods and/or services purchased recently). The legal basis for the processing of data for this purpose is art. 6, paragraph 1, letter f) of GDPR, without prejudice to the possibility of opposing such processing at any time, following the indications in the "Rights of the Data Subjects" section of this Information Notice.

Communication

The data may be communicated to third parties appointed as Data Processors pursuant to Article 28 of GDPR, as service providers strictly necessary for the performance of business activities or to consultants of the company, where this proves necessary for tax, administrative or contractual reasons or for requirements protected by current regulations. The personal data of the Data Subject or the personal data of third parties may also be communicated to external companies, identified from time to time, such as the manager of the Application, which RACCORDERIE METALLICHE S.P.A. entrusts the execution of obligations arising from the assignment received, to which only the data necessary for the activities requested by them will be transmitted.

All employees, consultants, temporary workers and/or any other "natural person" who, authorised to the processing, conduct their activity based on instructions received from RACCORDERIE METALLICHE S.P.A., pursuant to art. 29 of the GDPR, are designated "authorised to the processing". RACCORDERIE METALLICHE S.P.A. shall issue appropriate operating instructions to the Authorised Persons or Managers, if appointed, with reference to the adoption and compliance with security measures, to ensure the confidentiality and security of data. With reference to the protection of personal data, the Data Subject is invited, pursuant to art. 33 of the GDPR, to report to RACCORDERIE METALLICHE S.P.A. any circumstances from which a potential data breach may arise in order to allow an immediate assessment and the adoption of action to counter such an event by sending a communication to RACCORDERIE METALLICHE S.P.A. at the addresses reported below.

The data will not be spread out.

RACCORDERIE METALLICHE S.P.A. will be obliged to communicate the data to the competent authorities upon specific request.

Transfer abroad

The transfer of personal data abroad may take place if it is necessary for the management of the assignment received. For the processing of information and data that may be communicated, the same levels of protection adopted for the processing of personal data of its employees will be required. In any case, only the data necessary for the pursuit of the intended purposes will be communicated and the regulatory instruments provided for in Chapter V of the GDPR will be applied.

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Processing modes as well as storage duration

The data is processed in a lawful and correct way for the above-mentioned purposes in compliance with the fundamental principles established by the legislation.

The processing of personal data may take place by means of IT or telematic devices or in paper form, adopting the necessary technical and organisational measures to guarantee the security, confidentiality, and reduction of the risks of destruction or loss, even accidental, of unauthorised access or unlawful processing.

The data will be processed by RACCORDERIE METALLICHE S.P.A. for the entire duration of the relationship and subsequently for the time necessary to assert their rights or for administrative purposes and/or to implement legal obligations.

Rights of the Data Subjects

The following rights provided for by the GDPR are granted to the Data Subject:

- a) Access to personal data and any information relating to its processing.
- b) Rectification of inaccurate personal data and notification of the rectification to third parties to whom it has been transmitted.
- c) Erasure of data and notification of erasure to third parties to which they have been transmitted.
- d) Limitation of processing and objection (where applicable).
- e) Data portability from RACCORDERIE METALLICHE S.P.A. to another Data Controller or reception in a structured, commonly used, and machine-readable format.
- f) Complaint to the Supervisory Authority for the Protection of Personal Data.

To obtain more information about the processing of your personal data or to exercise your rights, you can contact RACCORDERIE METALLICHE S.P.A. (marketing@racmet.com).

Data Controller

The data controller, pursuant to art. 4 of the GDPR, is " RACCORDERIE METALLICHE S.P.A. - Campitello di Marcaria (MN), Strada Sabbionetana, 59 – 46010 P.IVA: 01591820202- CF: 02066990173 .

Data Controller

RACCORDERIE METALLICHE S.P.A.