



INFORMATION POLICY PROVIDED AT THE TIME OF PERSONAL DATA COLLECTION

In accordance with EU Regulation 2016/679

Dear Sirs,

the following policy is addressed to parties and individuals who are subject to a personal data processing procedure. We wish to inform you that the mentioned regulations include policies and rules to safeguard individuals during personal data processing procedures (any information concerning an identified or unidentified individual).

In accordance with the mentioned norms, personal data processing refers to any operation or combination of operations, carried out with or without the support of automated processes and enforced to personal data, or a combination of personal data as data collection, registry, organization, structuring, conservation, adaptation or amendment, extraction, consultation, use and communication via transmission, spreading or sharing, comparison or interconnection, limitation, cancellation or destruction.

Data processing shall be governed according to the principles of fair play, lawfulness, transparency and shall protect your privacy and your personal rights.

In accordance with Art. 13 and 14 of EU Regulation 2016/679, we wish to share the following information.

1. Data object of the treatment, legal basis and scope of the data processing

Data object of the processing is common personal data collected during customer and/or supplier relationship management for the fulfillment of obligations deriving from the law, contracts, practice and customs concerning supplier and/or sales contracts, their management and implementation and to the fulfillment of all the possible fiscal/social security and administrative tasks.

Data processing aims to fulfil obligations and exercise specific customer and supplier rights as:

- a) Manage existing commercial, contractual and financial relationships;
- b) Implement a service or one or more agreed contractual operations including preliminary information acquisition for contract conclusion;
- c) Execute legal obligations, fulfil all the transactions required by law, fiscal and taxation provisions, from the execution and implementation of the business activity and money laundering provisions;
- d) Satisfy operational or managerial requirements including customer and supplier relationship and/or supplies for the administration, bookkeeping, order processing, forwarding, invoicing, services and management of any litigation;
- e) Supply information and news on the business including information on products, services and future commercial initiatives;
- f) Submit product, service and offer ads with reference to services similar to those object of the relationship;
- g) Supply technical support, post sales assistance and customer satisfaction degree;
- h) Carry out internal market surveys or statistical analyses both via automated contacts (e-mail, other long distance communication tools via communication networks as, by way of example, text messages MMS, Whatsapp) or traditional contacts (ordinary paper mail) on behalf of the controllers;
- i) Manage and carry out all the necessary customs arrangements in case of an import/export activity including warehouse stock management and inspection assistance on behalf of the appointed Authorities;
- j) Carry out goods transportation and shipment;
- k) Eventually stock goods on hold at depot;



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- l) Carry out all the operations necessary to reach a correct and complete management of the shipment and/or goods in transit;
Your data shall be treated without your express consent (Art. 6 points b and e EU Regulation 679/2016) and communication of personal data is a necessary condition for contract conclusion and implementation.

2. Data processing procedure

Processing of your personal data shall be carried out both manually and electronically via appropriate tools specifically designed to ensure data security and confidentiality as well as through the use of automated tools capable of storing, managing and sharing data.

Though the use of tools and procedures aimed at guaranteeing data security and confidentiality, data can be collected, registered, stored, organized, selected, extracted, processed, compared, interconnected, communicated, blocked, deleted or destroyed.

3. Data storage period

Data shall be stored for as long as is strictly necessary to fulfill the obligations listed in the following Privacy Policy. Your personal data shall be therefore stored for the time needed to fulfil the purposes listed in Art. 2. After this period of time, your personal data shall be solely stored to comply with legal obligations and in any case, over a period not exceeding ten years from contract conclusion or in accordance with the terms foreseen by specific regulations on data storing and documentation (in particular, for administration, bookkeeping, order processing, production flow, maintenance and assistance, forwarding, invoicing, claims management activities: 10 years as provided for in former Art. 2220 civil code, without prejudice to any payment delay that extends this period of time).

Data shall be stored over a period not exceeding two years from data collection for marketing purposes.

4. Data supply

Data supply is voluntary but necessary to build and maintain business and/or contractual relationships between the concerned party and OME Metallurgica Erbesè S.r.l. Unipersonale. Failure to supply data shall entail the impossibility to build and/or maintain the business relationship to the extent that similar data is essential for the execution of the same.

Should data be collected by third parties, the policy shall have to be forwarded to the interested party within reasonable time and in any case within one month or, if foreseen, no later than the first communication sent to the interested party or other recipient, unless the controller is obliged to inform the interested party.

5. Parties to whom data can be transferred

Your personal data (that will be treated throughout the entire duration of the contract and subsequently for the fulfilment of all the legal obligations) may be communicated to OME Metallurgica Erbesè S.r.l. Unipersonale advisors to the extent necessary to carry out their duty at the company premises, distributors, producer and supplier venues in order for them to also carry out their duties, to forwarding companies for goods shipments and customs procedures, to banks for the management of payments, financial institutions and public authorities, companies and law firms for the protection of contractual rights, competent judicial and investigation authorities in case of express request from the Authorities, to the persons in charge and of data processing and, for the aforementioned purposes, to external partners, parties involved in the field of privacy and IT, to contractual counterparts and defense lawyers and, in general, to all those parties who require similar data to correctly comply with the above mentioned purposes.

6. Transfer of personal data to a foreign country

Your personal data shall not be transferred to countries outside the EU.



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7. Confidentiality and security measures of personal data

Your personal data shall be processed fairly and lawfully adopting any safety measure aimed at preventing unauthorized access, spreading, amendment or deletion of data. Specifically, the Company has implemented measures aimed at protecting your personal data from accidental loss and unauthorized access, use, amendment and sharing.

In the unlikely event that the Company believes the safety of your personal data has been or might have been compromised, the Company shall inform the interested party of the incident in the manner envisaged by the applicable law and via the means listed in the present policy.

8. Right of access by the data subject and claim procedure

It is specified that, with reference to the personal data entrusted, the holder of the following rights with reference to Art. 15 to 22 EU Regulation 679/2016:

- Require the Data Controller to access, modify or delete personal data or limit their treatment. Data treatment amendment, deletion or limitation required by the interested party, unless unfeasible or too demanding, shall be communicated by the data controllers to the personal data recipients (Art. 15, 16, 17, 18 EU Regulation 679/2016);
- Partially or completely object: a) for legitimate reasons to the processing of personal data although relating to the data collection scope; b) to the processing of personal data with the aim to forward advertising material or carry out market surveys or commercial communication, via automated systems without the assistance of an operator, via e-mail and/or via traditional marketing channels, via telephone and/or ordinary mail. We wish to underline that the right to object stated in point b) for marketing reasons via automated systems, can also be applied to traditional means of communication and that the interested party is entitled to partially exercise his right to object. The interested party can therefore decide to receive communications via traditional means, meaning automated communications, or neither of the two (Art. 21 EU Regulation 679/2016);
- Ask the Data Controller to transfer data to another Controller (data portability as provided for in Art. 20 EU Regulation 679/2016);
- Withdraw consent at any time without jeopardizing treatment lawfulness based on the consensus given before withdrawal (we wish to underline that the right of withdrawal cannot relate to cases in which data processing, for example, is necessary to fulfil a legal obligation or for the execution of a public interest task or a task that is strictly connected to the exercise of official authority for which the data controller is entitled to) (Art. 7 EU Regulation 679/2016);
- Make a complaint to the Data Protection Supervisor by following the procedures and guidelines published on the Authority's official web site (Art. 77 EU Regulation 679/2016) should he/she encounter a problem in the personal data management procedure.

In order to exercise any of the above stated rights, the interested party will have to issue a request to the Company at the following e-mail address privacy@ome.it . When contacting the Data Controller, the interested party will have to provide his name, e-mail address, mailing address and/or telephone number as well as a copy of his/her ID or passport to ensure that his claim will be correctly and suitably processed. The Company shall reply within one month from the date of the claim request; this deadline can be extended up to three months should the request be particularly complex and demanding.

9. Data holder and controller

For the purposes of this privacy and data processing policy, we wish to underline that any personal data collected or supplied via the above listed means shall be treated by the "Company" or "Data Controller" and that the terms will refer to OME Metallurgica Erbesse S.r.l. Unipersonale, legal office in (22036) Erba (Co) via Milano n. 15, Fiscal Code and VAT N. 00200910131, tel. +39 031 641606 – fax +39 031 645618 – mail: info@ome.it

For further information or comments concerning this privacy policy and to communicate with a privacy contact (person entitled to manage data processing requests) you may write to the following e-mail address privacy@ome.it



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The list of the data controllers and of the qualified and authorized persons is deposited at the Controllers' head office and can be supplied upon request.

OME Metallurgica Erbese S.r.l. Unipersonale