



PRIVACY POLICY

Information about personal data collected from the data subject in accordance with art. 13 GDPR

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Subject: **Information on personal data collected from the data subject in accordance with art. 13 GDPR**

Pursuant to art. 13 of the GDPR (EU Regulation 2016/679), the following information is provided, in accordance with the principle of transparency, in order to make the data subject aware of the characteristics and methods of data processing:

a. Identity and contact details

The Data Controller is ILSA S.p.A. (hereinafter "the Company"), with registered office in Via Quinta Strada, 28 - 36071 Arzignano (VI), Telephone: +39 0444 452020.

If you have any questions regarding our use of your personal data or this Privacy Policy, you may contact the Privacy Manager at the following addresses:

E-mail: pgirelli@ilsagroup.com

b. Purpose and legal basis of the processing

The processing of the personal data requested from the data subject is carried out for the purpose of drawing up and executing the contract or for the purpose of exercising rights and fulfilling obligations connected with and deriving from it, in particular administrative, accounting and tax obligations.

The Company may also use your data where this is necessary to pursue a legitimate interest of the Company. This includes the hypotheses in which the use of your personal data is necessary for:

- compiling internal statistics;
- apply for and receive funding, contributions, and other grants;
- request and obtain reimbursements from the insurance companies;
- marketing activities.

c. Recipients and any categories of recipients of personal data

The data are processed within the Company by persons authorized to process the data under the responsibility of the Data Controller for the purposes stated above.

The data may be communicated to the following categories of recipients: collaborators of the Company (such as: subcontractors, freelancers, companies responsible for certifying the financial statements, etc..) to companies belonging to our Group, for the same purposes indicated above; to public and private bodies and peripheral offices of the public administration for the fulfilment of their respective responsibilities, or, from time to time, to credit institutions responsible for the payment/recovery of the respective items of credit/debit; to companies providing computerized postal services; to couriers responsible for freight transport ; to factoring companies; to the sales network; to insurance companies; to credit recovery companies and to commercial information companies.

d. Data transfer to third country

In order to fulfil the contract between us, your personal data may be transferred to countries within or outside the European Union, some of which may not provide adequate data protection guarantees (a complete list of countries that provide adequate data protection guarantees is available on the website of the Data Protection Authority). In such cases, the Company will endeavour to ensure appropriate safeguards to protect your personal data in those countries in accordance with this Privacy Policy. Some of the safeguards that we may adopt, where appropriate, include: the use of standard contractual clauses approved by the European Commission with our suppliers, intra-group transfer contracts (so that we can safely transfer your personal data between group companies around the world) and the signing of contracts with certified Privacy Shield companies in the United States.

e. Data Retention Period

We will retain your personal data only for the time necessary to achieve the purposes for which it was collected, and also to meet any legal, accounting or reporting requirements.

In general, this means that we will retain your personal data for the duration of the contractual relationship and, subsequently, for a period of 10 years from the termination of the contract or, in case of dispute, for the prescription period provided by the law for the protection of related rights, without prejudice in any case to longer retention periods provided for by specific industry regulations.

In some circumstances we may anonymize your personal data so that it can no longer be associated with you, in which case we may use that data without further notice to you.

f. Data rights

Please note that, with regard to your personal data, you can exercise the following rights:

1. right of access to your personal data; right of rectification or erasure of your personal data or to have their processing limited;
 2. right to object to processing;
 3. right to data portability (right applicable only to data in electronic form), as regulated by art. 20 of the GDPR.
- Concerning the methods of exercising the above rights, the data subject may write to the Privacy Manager.

g. Complaint

You are informed that you have the right to lodge a complaint with the competent independent administrative authority in the Member State of the European Union where you usually reside, work, or where an alleged violation of the law on the protection of personal data has occurred. On Italian territory, the data subject can submit a complaint to the Data Protection Authority (Tel: 06/69677.3785, website: www.garanteprivacy.it).

h. Provision of data



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The provision of data is necessary to allow the Company to fulfill its contractual obligations, such as for example accounting and tax, any refusal to provide the requested data or authorization to process them, will not allow the completion of the contractual relationship or to give full and proper execution to the same, to the extent that such data is necessary for its execution.

i. Different purpose of treatment

It is specified that if the Data Controller intends to further process personal data for a purpose other than that for which they were collected, prior to such further processing, the Data Controller will provide the data subject with information regarding such other purpose and any further relevant information.

j. Profilation

The Data Controller shall not use automated processes for profiling purposes.