

ESSETI MECCANICA DI PRECISIONE SRL



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Personal Data Processing Policy Pursuant to Article 13–14 of EU Regulation 2016/679

Data Subjects: contact persons at Customer Companies.

ESSETI MECCANICA DI PRECISIONE SRL, as Data Controller of your personal data, pursuant to and for the effects of EU Regulation 2016/679 (hereinafter, "GDPR"), hereby informs you that the aforementioned regulation provides for the protection of Data Subjects regarding the processing of personal data and that such processing will be based on the principles of correctness, lawfulness, accountability and the protection of your privacy and your rights.

Your personal data shall be processed in accordance with the legislative provisions of the aforementioned legislation and the confidentiality obligations set therein.

Purpose and legal basis of processing: – In particular, your data will be used for the following purposes related to the execution of measures related to contractual or pre-contractual obligations:

- Management of relations during sales operations;
- Planning of activities.

Processing method – Your personal data may be processed in the following ways:

- Processing in digital format;
- Manual processing on paper.

All processing is carried out in accordance with the procedures laid down in Articles 6(32) of the GDPR and taking the appropriate security measures as required.

Your data will only be processed by personnel expressly authorised by the Data Controller and, specifically, by the following categories of authorised personnel:

- Management;
- Production;
- Administration;
- Sales;
- Marketing;
- Programming;
- Quality;
- Technical Office.

Your data may be communicated to external parties for proper management of the relationship and in particular to the following categories of recipients including all duly-appointed Data Processors:

- Consultants and freelancers, individually or in association;
- Shippers, transporters, self-employed drivers, postal services, and logistics companies.

Dissemination – Your personal data will not be disclosed in any way.

Retention period – Please note that, in compliance with the principles of lawfulness, limitation of purpose and data minimisation, pursuant to Article 5 of

the GDPR, the retention period for your personal data is:

- No longer than is necessary for the purposes for which the data was collected and processed to fulfil the contractual obligations;
Established for a period of time not exceeding the execution of the services provided;
- No longer than is necessary for the purposes for which it has been collected and processed and in compliance with the obligatory time
- limits set by law.

Data Controller – The Data Controller, pursuant to the Law, is ESSETI MECCANICA DI PRECISION SRL (Via Statale Sud 163 - 41037 Mirandola in Modena, having VAT no. 01848320360, which can be contacted via: email to info@officinaesseti.it, telephoning +39 0535 26606) in the person of its legal representative pro tempore.

You have the right to obtain from the Data Controller the erasure (Right to be Forgotten), limitation, updating, rectification, portability, opposition to the processing of personal data concerning you, as well as being able to exercise in general all rights outlined in Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21 and 22 - Rights of the Data Subject

1. The Data Subject is entitled to receive confirmation as to whether or not personal data concerning them exists, even if the data has not yet been recorded, and to have the data communicated in intelligible form, as well as to lodge a complaint with the Supervisory Authority.

2. The Data Subject has the right to know:

- a. The origin of the personal data;
- b. The purposes and methods of processing;
- c. The logic applied in the event of processing carried out with the aid of electronic instruments;
- d. The identifying details of the Data Controller, the Data Processors and the designated representative in accordance with Article 5(2);
- e. The subjects or categories of subjects to whom the personal data may be communicated or who can learn about such as appointed representative in the territory of the State, of Data Processors or Agents.

3. The Data Subject has the right to obtain:

- a. The updating, rectification or, where relevant, integration of the data;
- b. The erasure, transformation into anonymous form or blocking of data that has been processed unlawfully, including data whose retention is unnecessary for the purposes for which it has been collected or subsequently processed;
- c. Formal notification 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 has been communicated or disseminated, except in the case where such fulfilment proves impossible or involves a use of means manifestly disproportionate to the protected right;
- d. The portability of the data.

4. The Data Subject has the right to oppose, in whole or in part:

- a. For legitimate reasons, the processing of personal data concerning them, even if pertinent to the purpose of the collection;
- b. The processing of personal data concerning them for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.