

DISCLOSURE ON PERSONAL DATA PROCESSING

Contracts - Suppliers and Customers with newsletter

Pursuant to articles 13 and 14 of EU Regulation 2016/679 (GDPR or Regulation), and in general in compliance with the principle of transparency provided for by said Regulations, Ninz S.p.A. (the Company) provides the following information regarding the processing of personal data.

1. Data controller

The data controller (i.e. the party that determines the purposes and means of processing personal data) is NINZ S.p.A., with registered office in Ala (TN), Corso Trento 2/A, Tax ID 01566290225, PEC (certified e-mail) amministrazione@cert.ninz.it, tel. +39.0464.678300, fax +39.0464.679025.

For specific contacts regarding the protection of personal data, including the exercise of the rights referred to in paragraph 8 below, kindly contact: privacy@ninz.it to address any requests. It is hereby announced, that the Data Controller has designated, pursuant to art. 37 of the Regulation, the person in charge of data protection (Data Protection Officer, abbreviation "DPO"), which can be contacted through the following channels; postal address: Ninz S.p.A., Ala (TN), Corso Trento 2/A; e-mail: privacy@ninz.it, tel. +39 0464 678300.

2. Processing Purposes

The processing of personal data may have the following purposes:

- 1) stipulation of contracts and fulfilment of contractual obligations (the responsibility and in favour of the Controller), and therefore for purposes strictly related to the management of the contractual relationship with you, including formalities and administrative and accounting obligations (for example: acquisition of information preliminary to the conclusion of a contract, execution of operations based on the obligations arising from the contract concluded; for operational and management needs; for control over performance; for verification of tax and contributory regularity; for the management of litigation - contractual non-fulfilment; warnings; transactions; credit recovery; arbitration; judicial disputes, etc. -) (contractual purposes)
- 2) promotion and sale of products and services through e-mail newsletters (marketing purposes);

3. Type of data processed

The following categories of data may be processed:

- surname, name, date and place of birth, residence and/or location;
- tax ID and/or VAT;
- telephone number/e-mail/PEC;
- (where applicable for the case of joint and liability, etc.) relating to the regularity of the fulfilment of remuneration and social security obligations.

4. Legal basis of the processing and mandatory conferment

With regard to the purpose 1) of the previous point 2:

There is no obligation to confer data in the pre-contractual phase, but failure to provide it will make it impossible to conclude the contract; once the contract has been stipulated, the conferment of further data required, or the updating of those already provided, is mandatory for all that is required by legal and contractual obligations; therefore, any refusal to provide them in whole or in part may give rise to the impossibility for the Company to execute the contract and could however configure your contract non-fulfilment or violation of the law.

The legal basis of processing consists in the fact that processing is necessary: for the execution of the contract with you in place or of the pre-contractual measures adopted upon your request or for the fulfilment of a legal obligation to which the Data Controller is subject.

With regard to the purpose 2) of the previous point 2:

Conferment is optional and processing will take place only with your consent as a party concerned, specifically released for the purpose indicated; in case of failure to confer the data, or lack of expression of the relative consent, therefore, you will not be sent the newsletter and in general, your data will not be processed in relation to the purpose referred to in this disclosure.

In any case, we wish to remind you that the law (article 130, paragraph 4 of Legislative Decree 193/2003, Privacy Code and subsequent amendments) allows the sending, via the e-mail provided by you, of communications concerning the direct sale of products or services similar to those already supplied by us, provided that you, adequately informed, do not refuse such use, initially or on subsequent communications.

5. Collection, processing and storage methods

The data are collected from the party concerned, i.e. the data that you provide us, as well as those resulting from public records (such as CCIAA) or obtained from the relevant authorities in relation to the necessary checks on the subject of contributory regularity, etc.

Processing will be carried out:

- by using manual and automated systems;
- by parties or categories of parties authorized to carry out the related tasks;
- using appropriate measures to guarantee the confidentiality of data and prevent access by unauthorized third parties.

In relation to the purpose 2) of the previous point 2 (newsletter), processing will be carried out also by means of automated e-mail sending systems.



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Regarding the contractual purposes (purpose 1 of the previous point 2), your data will be kept for the entire duration of the contractual relationship, and, after the termination of the relationship - limited to the data necessary at that point - for the termination of the contractual obligations assumed and for the fulfilment of all the possible legal obligations and for the requirements of protection also connected to or arising from it.

Regarding the marketing purpose (purpose 2 of the previous point 2), processing for the purpose stated may have duration until consent is revoked, and in any case no later than two years from when consent was expressed or renewed and, if there is a contractual relationship from the termination of the contractual relationship legitimating the sending of communications concerning the direct sale of products or services similar to those already supplied by us, no later than two years from the last purchase.

There are no automated decision-making processes.

6. Communication of data

Without prejudice to communications made in compliance with legal and contractual obligations, all data collected and processed may be communicated, exclusively for the purposes specified above, to:

- a) all parties to which the right of access to such data is recognized by virtue of regulatory provisions;
- b) employees, collaborators, suppliers of the Controller, in the context of the related duties and/or contractual obligations related to the execution of the contractual relationship with you; the Controller's suppliers include, for example, banks and credit institutions, insurance companies, legal consultants, lawyers, tax consultants and accountants, credit recovery companies, companies that detect financial risks and that perform fraud prevention activities, companies responsible for meter reading, invoice printing and mailing companies, invoice delivery companies, etc.; if your contractual relationship with us involves contacts with our customers or third parties, your personal data - to the extent necessary for the performance of your service - may also be disclosed to said parties.
- c) where required by law, public authorities (including financial administration), social security institutions, etc.;

7. Place of data processing

The activity takes place on the territory of the European Union, except for the management of sending the newsletter (if you have given consent for this purpose), for which the platform of the company MailChimp is used, which may involve the transfer of the related data in the United States of America; said transfer is authorized on the basis of specific decisions of the European Union and the Guarantor for the protection of personal data, in particular the decision of adequacy of the EU Commission 1250/2016 (Privacy Shield), for which no further consent is required, and the aforementioned company shall guarantee its adherence to Privacy Shield.

Outside of this circumstance, there is no intention to transfer data outside the territory of the European Union or to an international organization.

8. Rights of the Party Concerned

We wish to remind you that the GDPR grants you the exercise of the following rights of:

- a) access to personal data (you will therefore be entitled to have free information about the personal data held by the Controller and related processing, and to obtain a copy in an accessible format);
- b) rectification of data (following your request, we will ensure the correction or integration of your data - non-expression of evaluation elements - incorrect or imprecise, even if they have become such as not updated);
- c) withdrawal of consent (if processing is by means of consent expressed by you, you can revoke consent at any time, without prejudice to the lawfulness of processing provided before revocation)
- d) deletion of data (right to be forgotten) (for example, data are no longer necessary for the purposes for which they were collected or processed, have been unlawfully processed, must be deleted to fulfil a legal obligation; you have revoked and there is no other legal basis for processing, you oppose to processing);
- e) processing limitation (in certain cases - confirmation of the accuracy of data, in the time necessary for verification, dispute of the lawfulness of processing with opposition to cancellation; need for use for your rights of defence, while they are no longer useful for the purposes of processing; if there is opposition to processing, while the necessary verifications are carried out - the data will be stored in such a way as to be able to be restored; however, in the meantime, they may not be consulted by the Controller if not in relation to the validity of your limitation request).
- f) opposition in whole or in part to processing for legitimate reasons (in certain circumstances, you may still oppose the processing of your data, in particular, if personal data are processed for direct marketing purposes, you have the right to oppose processing at any time, including profiling to the extent related to such direct marketing. If personal data are processed for scientific or historical research purposes or for statistical purposes, for reasons related to your particular situation, you have the right to oppose processing, unless processing is necessary for the performance of a task of public interest);
- g) data portability (if processing is based on consent or on a contract and is carried out by automated means, upon your request, you will receive personal data concerning you in a structured format, commonly used and readable by an automatic device and may send them to another Data Controller, without impediments by the Data Controller that provided them and, if technically feasible, you can request said sending to be made directly by the latter).
- h) proposition complaint to the supervisory authority (Guarantor for the protection of personal data - Privacy Guarantor).

All information relating to the protection of personal data, including an updated copy of this disclosure, can be found on the portal www.ninz.it/en/privacy.