

INFORMATION NOTE ON PERSONAL DATA PROCESSING FOR MARKETING AND SALES PURPOSES

PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679

Pursuant to article 13 of Regulation (EU) 2016/679 (EU GDPR) (hereinafter called the “**Regulation**”), Iltom SpA (C.F.-P.IVA: 13251320159), headquartered in Romanengo (CR), Via delle Industrie, 26/28 (hereinafter called the “**Company**”), acting in its capacity as Data controller (hereinafter called the “**Data Controller**”), informs the Data Subjects that, in performing its activity according to the appropriate prefectorial authorization (under article 134 of the Consolidated Act on Public Security), Iltom collects some personal data appearing on public registers, lists or records or contained in public deeds or documents (e.g. filed at the Chamber of Commerce or at the “Agenzia del territorio” – Italian land registry) or, however, generally accessible (since contained, e.g., in categorical lists, press information and internet sites accessible to anybody) (hereinafter called the “**Data**”).

You can contact the Data Processor (hereinafter called the “**DPO**”), at the Company, at the email address dpo@iltom.it.

Purpose, method and personal data processed

For marketing and sales purposes, the Company may collect both organisational, production, industrial, commercial, economic, financial, property, administrative and accounting information relevant to the activity carried out by economic operators (such as, individual enterprises or family businesses, small businesses, professionals, important executives, etc.) and data regarding natural people who do not carry out a business or professional activity (marketing and sales information includes data relevant to company registration reports, financial statements, protests and bankruptcy procedures, prejudicial deeds filed at the land registry, data from the land and mortgage registry as well as judicial information having appeared in public sources or generally accessible to anyone).

Data is processed by the Company to provide third parties with marketing and sales information services necessary to assess the activities, economic and business soundness and capacity of a person and to carry out checks regarding any existing or potential business relationships (which may be precluded in case of lack of accurate and comprehensive information), as well as to protect the relevant rights.

With regard to the above purposes, data is processed manually or using electronic and telematic tools following logic strictly connected with the purposes and, however, using methods aimed at ensuring the safety and confidentiality of data, besides meeting specific legal obligations on the matter.

Iltom data bases are organized and managed using computerized procedures necessary for the communication to its customers, also via telematics systems, of documents containing data obtained from public sources and/or the analysis, comparison and processing of this data for the drawing up of economic or commercial information reports or dossiers to be provided to the customers asking for them.

In preparing these reports or dossiers, Data collected by our Company may undergo further analysis or statistical processing, also an automated one, in order to evaluate or formulate an assessment, even if concise or under the form of a score, on the degree of reliability, solvency or economic and business capacity of the company or of the person involved and/or on the probability of insolvency of a company by considering, for instance, its overall assets, economic and financial situation as well as its previous or current receivables and payables, even regarding subjects with important responsibilities or functions.

Data will be processed by respecting the principle of lawfulness, fairness and relevance, pursuant to article 5.1, letters a), b), c), d) and f) of the Regulation, and in compliance with article 32 of the Regulation.

Nature and method of provision of Data

Data will be processed without any consent, in the exercise of our legitimate interest as well as that of the other data controllers, to know the economic reliability of customers and suppliers, pursuant to art. 6.1.f) of Regulation (EU) 2016/679, in compliance with article 24, paragraph 1, letter c) and d) of Legislative Decree 196/2003 and of the Code of Deontology, Attachment A.7, as this data comes from public records, lists, deeds or documents accessible to anybody and relevant to the practice of business activities (data relevant to consumption reports will not be processed).

Nevertheless, information processed shall always be relevant and not excessive and all regulations concerning personal data protection will be met.

Communication, dissemination and retention of data

Data may be shared with natural people authorized from the Data controller, pursuant to article 29 of the GDPR, within the scope of their tasks and duties (e.g. employees, system administrators, etc.), with service providers (such as consultants, credit institutions, etc.) which typically operate as Data Processors, pursuant to art. 28 of the Regulation, with our Customers asking for it for the provision of commercial information services and, if required, with bodies or authorities to which Data shall mandatorily be provided to meet legal provisions.

Should Data be transferred to non-EEA countries, the Data Controller informs that data will be processed in compliance with one of the methods allowed by existing laws, such as the adoption of Standard Clauses approved by the European Commission, the selection of

subjects adhering to international programs on the free flow of data (e.g. EU-USA Privacy Shield) or subjects operating in Countries regarded as safe by the European Commission. For further information, please contact the DPO at the above address.

Data will be retained only for the time needed to fulfil the purpose for which it has been collected, respecting the principle of minimization, pursuant to article 5, paragraph 1, letter c) and of the GDPR. However, data will be retained for the duration set in the Code of deontology and conduct concerning personal data processing carried out for commercial purposes - Attachment A.7 of the Legislative Decree 196/2003. For further information, please contact the Data Controller.

Rights of the data subject

The data subject shall have the right to ask the Data Controller, at any time, to access their data, their rectification or, if necessary, their erasure or to object to their processing. If applicable, the data subject shall also have right to ask to restrict the processing to the cases provided by article 18 of the Regulation and to receive their data in a structured, commonly used and machine-readable format, under article 20 of the Regulation. Moreover, the subject shall have the right to lodge a complaint with a supervisory authority for the protection of their personal data pursuant to article 77 of the GDPR, if they consider that their rights under this Regulation are infringed.

Without prejudice to the right of the data subject to object to the processing of data pursuant to article 21 of the GDPR, with a request supported by the reasons for the opposition, the Data controller reserves the right to evaluate the request which will be refused if there are compelling legitimate grounds to process data overriding the interests, rights and freedom of the data subject.

For further information, please contact the DPO at the above address.

Updated on 23 may 2018