

Privacy information for customer personal data processing

According to D.L. n. 196/2003 and EU Regulation n. 679/2016 (GDPR) and with regard to personal data of your concern and that will be the object of processing activity, we inform you that:

1. PURPOSE OF DATA PROCESSING

TUMAC S.r.l. as data controller, will process his customer's data for below purposes only:

- a) Evaluation on a possible contract agreement (customer economic capacity and possible future reputation consequence on business relation, anticorruption compliance and money laundering);
- b) Conclusion, management and execution of contracts drafted with customer;
- c) Law compliance in relation to civil, fiscal and accounting regulation; compliance on contract obligation; assistance and technical support with regards to any possible non-conformity of products you have purchased, after-sales as well and after warranty period if applicable; relations administrative management;
- d) marketing and references, information for future commercial actions, innovations on products and/or services, offers, market analysis, statistics.

2. LEGAL BASIS OF DATA PROCESSING

Customer personal data will be treated following consent expressed by signing this information paper. We inform you that, without any consent or after its revocation, your personal data may be used in the following circumstances and legal basis:

- a) If data processing is necessary in the execution of a contract you are part of, or in the execution of precontractual measures your request;
- b) If data processing is necessary for TUMAC S.r.l. legal obligation;
- c) If data processing is necessary for the safety of one's person interest
- d) If data processing is necessary for the execution of public interest task or linked to the exercise of public power of which TUMAC S.r.l. is responsible
- e) If data processing is necessary TUMAC S.r.l. pursuit of legitimate interest; in particular we consider legitimate interests:
 - Interest to draw up, manage and execute contracts as per point 1 b);
 - Interest to protect one's rights that may directly or indirectly arise from those contracts;
 - Interest to protect company safety and assets;

at the condition that all interests, rights and fundamental freedoms of the person who asks for protection of his own data don't prevail.

3. DATA PROVISION

Considering the autonomy of concerned person, directly acquired data provision can be:

- a) compulsory according to law, regulation or EU legislation and also according to disposition issued by authorities legitimated by the law or issued by supervisors and control bodies;
- b) Strictly necessary to the agreement of new contracts between customer and TUMAC S.r.l. or to management and execution of ongoing ones. Possible opposition to data processing and/or refusal of personal data provision may cause impossibility or refusal of partial or complete new agreement

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and execute of ongoing contracts, may cause also impossibility to comply with legal obligation, regulation or EU legislation and to disposition issued by authorities legitimated by the law or issued by supervisors and control bodies;

- c) the data given at point 1. d) is collected with expressed and explicit consent through the website.

4. DATA COLLECTED BY THIRD PARTIES

We inform you that personal data subject to processing activity, in particular those referred to point 1. a) may be collected by third parties through access to public database or through dedicated inspection services.

5. DATA PROCESSING METHOD

Personal data processing may be executed through both analogic, electronic or automatic methods, using methods and procedures strictly necessary to pursuit of above-mentioned scopes.

TUMAC S.r.l. conducts data processing directly through his own organization subjects or through external subjects. Those subjects will treat data:

- a) In accordance to instructions received from data Controller, respectively as authorized or responsible, and exclusively for the achievement of the specific purposes indicated in this statement;
- b) In total autonomy, as autonomous holders.

6. DATA COMMUNICATION AND DISCLOSURE

Personal data, exclusively following scopes of point 1, may be communicated to:

- a) TUMAC S.r.l. personnel and collaborators authorized to data processing by the company;
- b) Banks, service companies for registration, enveloping, transport and sorting of documents, contractors companies or service providers, notaries, lawyers, experts, consultants and specialized companies for debt collection and auditing;
- c) Subjects to whom communication is due complying to any collective agreements (labor unions) or specific legal obligation (Public security bodies or any other public authority) Any other data distribution is excluded.

7. RIGHTS OF THE INTEREST PARTY

Data protection legislation (art. 7-10 D.Lgs. 196/2003 and art. 12-22 EU REGULATION 679/2016) grants the right to be informed on data processing, and the right of any time access to those data and request for updating integration and amendment. Where applied, the interested party can also claim the right to the deletion of data, to the limitation of their processing, to the portability of data, to the opposition to treatment and the right not to be subjected to decisions based solely on automated processing.

If personal data processing is based on interest party approval, he has the right to revoke that approval. The interest party regarding the exercise of his own rights and also regarding any detailed information about the subjects or the categories of subjects to whom data are communicated or who are aware of them as responsible or authorized subjects, may contact the data protection reference person at TUMAC S.r.l. – Via Liberazione,

33/35 – 20098 San Giuliano Milanese (MI) or mailing to: info@tumac.it

If he considers that his rights have been violated, he can protect himself by proposing a complaint before the Guarantor for the protection of personal data.

8. DATA CONSERVATION PERIOD

Personal data will be kept for the period necessary to achieve the purposes referred to in point 1 and, following the exhaustion of these purposes, until the limitation period of the rights arising from you and

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TUMAC S.r.l. as a consequence of the legal and factual relations between the parties and connected directly or indirectly to those purposes (10 years).

9. THIRD PARTIES DATA PROCESSING

Customer is aware that, if he involves third parties (for example representatives, personnel and collaborators) in the execution of contracts agreed with TUMAC S.r.l., their personal data can be treated by TUMAC S.r.l. as data Controller for the purposes referred to in point 1 and in particular the customers' contacts and assignees. These treatments have the same purposes, methods and retention times of the data described in this statement; in relation to these treatments, in addition, the interested parties have the same rights identified in point 8. The customer undertakes to correctly inform the interested parties involved about the aforementioned treatments, also by submitting them to this statement and by registering their signature for inspection.