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#### **PRIVACY DISCLOSURE**

In compliance with the European Regulation (EU) 2016/679 concerning the protection of personal information ("**GDPR**" patent), the following information is disclosed with regard to the provision and processing of personal data of those who have relationships or contacts with PROMAPLAST srl and/or with regard to whom the latter makes operations of data processing.

#### 1. DATA PROCESSING CONTROLLER

Pursuant to articles 4, paragraph 7 and 24 of the GDPR the Data Controller of your personal data is the company PROMAPLAST srl, in the person of the legal representative Mario Maggiani, VAT number 06128590152, with registered office in Italy, Assago (MI), Centro Direzionale Milanofiori Palazzo F/3, (hereinafter, for the sake of brevity, "**PROMAPLAST**"), which can be contacted in writing at the email address: privacy@promaplast.org or by mail at the address indicated above.

#### 2. LEGAL BASIS AND PURPOSE OF THE POLICY

PROMAPLAST will process personal data on a case by case basis:

- a) for purposes connected to the obligations established by laws, regulations, community regulations, as well as by instructions issued by the competent authorities/supervisory and control entities, as well as to exercise the rights of the Data Controller (including, for example, the right of defense in a judgment);
- b) for purposes strictly connected and/or necessary for the fulfillment of pre-contractual, contractual and tax obligations deriving from relations with PROMAPLAST or regarding products or services offered by PROMAPLAST;
- c) for promotional and/or marketing purposes, such as transmission via e-mail, mail and/or telephone contacts, relating commercial communications newsletters, magazines (i.e. MacPlas) and/or advertising material (including any catalogs, illustrative and promotional leaflets), missions, market foreign research, technical and advertising films, communications regarding organized events by PROMAPLAST (including PLAST and other trade fairs also not sectoral ones, events, meetings....), conferences, congresses and the services provided by the latter.

#### 3. TYPES OF DATA PROCESSED

The data processed by PROMAPLAST may include: a) personal data; b) contact data; c) images d) as well as any other data strictly connected to the execution in your favor of the services and/or products offered by PROMAPLAST.

It should be noted that PROMAPLAST does not request and does not process its own particular categories of data (that is, personal data suitable for detecting racial and ethnic origin, religious, philosophical or other beliefs, political opinions, parties, unions, associations or organizations of a religious, philosophical, political or trade union nature, as well as personal data suitable for detecting health status and sexual orientation); however, where it is necessary to process such data to execute

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in your favor the services and/or products of PROMAPLAST, the latter will ask you expressly and in writing your consent.

## 4. PROVISION OF DATA

The provision of data for the purposes referred to in paragraph 2, letters a) and b), is necessary. Any refusal to communicate the data for such purposes, or in any case the partial or incorrect provision of the same, will make it impossible for PROMAPLAST to fulfill its obligations.

However, the provision of data for the purposes referred to in paragraph 2, letter c) is optional. The data subject can therefore decide not to give any data or to subsequently deny the possibility of processing data already provided: in this case, PROMAPLAST will not be able to send communications and/or commercial or advertising material, including the catalogs illustrating PROMAPLAST products or services.

Pursuant to art. 7, par. 3 of the GDPR, the data subject has the possibility to withdraw its consent at any time.

### 5. ADDRESSEES AND EVENTUAL CATEGORIES OF ADDRESSEES

Personal data will be made accessible under the responsibility of the Data Controller:

- to the subjects (employees of PROMAPLAST) authorized by the same pursuant to art. 29 of the GDPR;
- in the case of inspections and/or checks (if requested) to all the inspection bodies responsible for controls and checks regarding the regularity of legal obligations;
- to companies or professional firms that provide assistance, advice and collaboration to the Data Controller in accounting, administrative, fiscal, legal, tax and financial matters; for this purpose appointed as Processor;
- to third party service providers appointed, if necessary, Processor for whom communication is necessary for the performance of the services by PROMAPLAST;
- to public administrations for the performance of institutional functions within the limits established by law or various regulations.

The updated list of Processors can always be requested to the Data Controller and is available at the registered office of PROMAPLAST.

### 6. TREATMENT METHODS

The processing of personal data will be based on principles of correctness, lawfulness, transparency and will be carried out by means of the operations indicated in art. 4, n. 2, of the GDPR and which, among other things, collection, registration, organization, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Personal data will be processed both paper and electronic and/or automated.

Data is kept and checked by adopting appropriate preventive security measures aimed at minimizing the risks of loss and destruction, unauthorized access, unauthorized processing and not in accordance with the purposes for which the consent to the collection is given.

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## 7. TRANSFER OF INFORMATION

The collected data are stored on servers located in European Union.

Pursuant to art. 13, paragraph 1, letter (f) of the GDPR, we inform you that personal data may be transferred to countries outside the EU. In this regard, the Data Controller ensures from this point forward that all guarantees will be taken to make this transfer secure and to ensure that the processing of personal data complies with the requirements of the GDPR (such as, for example, the assumption of agreements of data protection through the use of contractual clauses in line with the standards set by the European Commission, of adequacy decisions, etc., the selection of subjects adhering to international programs for the free circulation of data (e.g. EU-USA Privacy Shield) or operating in countries considered safe by the European Commission. On this point, the Data Controller will, at the request of the data subject, issue the necessary information (including, in the case, a copy of all the relevant documentation).

The Data Controller also reserves the right to use services in the cloud; in this case, the providers of such services will be selected among those providing adequate guarantees.

## 8. RIGHTS OF THE DATA SUBJECT

In compliance with the provisions of the GDPR, the data subject has the right, where applicable, to ask the Data Controller to access the data (Article 15), the correction (art 16), the cancellation or the wiping of the same (Article 17), the limitation of the processing of personal data concerning the data subject (Article 18), the right to data portability (Article 20) or to object to their processing (Article 21), in addition to the right to not be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or which significantly affects his person (Article 22).

Requests may be submitted in writing to the Data Controller at the address of the legal headquarters and at the email address indicated in point 1.

The data subject has the right to lodge a complaint with the supervisory authority (Article 77 of the Regulations) if he/she considers that the processing performed by the Data Controller is not in compliance. For more information you can consult the website of the Privacy Guarantor www.garante privacy.it/en.

### 9. DATA CONSERVATION

The Data Controller will keep personal data for the time strictly necessary to fulfill the purposes for which it was collected and provided (as provided for in paragraphs 2 and 4 above).

Personal data may be kept for a longer period in compliance with a legal obligation (also of a fiscal nature) or by order of an authority. Subsequently the data will be deleted or rendered inactive or anonymous.