

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF “CUSTOMERS, SUPPLIERS, AND COMMERCIAL PARTNERS”**(under Article 13 of Regulation (EU) 2016/679)**

The Data Controller is **SIDERFORGEROSSİ GROUP SPA**, VAT number 03862910241, located at Via Cartiera di Mezzo n. 38, Arsiero (hereinafter also referred to as “**SFRG**” or “**Data Controller**”), which, with this document, wishes to inform you about the purposes and methods of processing your personal data and about the rights that are granted to you under Regulation (EU) No. 679/2016 concerning the protection of natural persons with regard to the processing of personal data and their free movement (hereinafter also referred to as the “**GDPR**”).

1. WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS

For the purposes outlined in this Privacy Notice, the Data Controller may process common personal data of individuals or employees, administrators, collaborators, and representatives of such individuals, such as personal data (name, surname, address, phone number, email, and other contact details), economic and financial data, as well as data related to any reliability and creditworthiness checks, as well as data related to the relationship with the Data Controller. The Data Controller may also process personal data related to criminal convictions and offenses within the limits established by Article 2-octies of the Privacy Code.

Such data are provided directly in the pre-contractual and/or contractual phase, or they may come from public sources or third parties, such as specialized companies providing commercial information or from the Judicial Authorities.

2. PURPOSES OF THE PROCESSING AND LEGAL BASIS

Your personal data will be processed, without the need to obtain your specific consent, for the following purposes:

a) Execution of pre-contractual/contractual measures: The processing of your personal data is aimed exclusively at carrying out activities related to the conclusion of contracts/orders for the supply of services and professional performances and the subsequent management of administrative, accounting, and tax obligations.

The legal basis for the processing is the performance of a contract to which you or the entity for which you operate is a party, or the execution of pre-contractual or contractual measures (Article 6(1)(b) of the Regulation).

b) Compliance with legal obligations: The legal basis for the processing is the fulfillment of obligations arising from laws (such as, for example, anti-money laundering checks, tax-related communications), regulations, and/or national or EU rules, as well as provisions issued by supervisory and control authorities or other authorities authorized to do so, to which the Data Controller is subject (Article 6(1)(c) of the Regulation).

c) Defending the interests of the Data Controller in case of disputes and/or responding to requests from the Judicial Authority or other Public Authorities.

The legal basis for the processing is the pursuit of the legitimate interest of the Data Controller or third parties (Article 6(1)(f) of the Regulation), to the extent strictly necessary for the pursuit of such legitimate interest and based on an appropriate balance with your fundamental rights and freedoms.

Providing personal data is therefore a necessary requirement for the establishment of the contract and/or for the fulfillment of the legal obligations to which the Data Controller is subject. The failure to provide such data will consequently prevent the Data Controller from concluding and performing the contract and/or complying with legal obligations.

3. HOW YOUR PERSONAL DATA IS PROCESSED

The processing of personal data is carried out through the operations listed in Article 4, No. 2) of the GDPR and will take place using both paper-based and electronic tools, with logic strictly related to the purposes indicated and, in any case, in a manner suitable to ensure security and confidentiality in accordance with the provisions of Article 32 of the GDPR.

4. WHO MAY RECEIVE YOUR PERSONAL DATA

Your personal data may be shared with:

Siderforgerossi Group SpA

Sede legale ed amministrativa: 36011 ARSIERO [VI] Italy - Via Cartiera di Mezzo, 38 - P.O. Box 42

Tel. +39 0445-714400 - Fax +39 0445-714444 - P. IVA IT03862910241 - REA: VI - 360434 - info@siderforgerossi.com - PEC: siderforgerossi@legalmail.it
Cap. Soc. € 5.000.000,00 i.v. - Società a socio unico - Società soggetta ad attività di direzione e coordinamento della Hephaestus Holding III B.V.

Unità produttive: • 36011 ARSIERO [VI] Via Cartiera di Mezzo, 24/38 - Tel. +39 0445 714400 - Fax +39 0445 714444 • 36010 COGOLLO DEL CENGIO [VI] Italy
Via M. Schiro, 2 - Tel. +39 0445-714422 / Fax +39 0445-714455 • 36010 VELO D'ASTICO [VI] - Via dell'Industria, 32 - Via della Tecnica 34 - Via dell'Artigianato, 18
• 10080 BUSANO CANAVESE [TO] - Via Rolando Perino, 37 - Via Stefano Bruda, 39- Tel. +39 0124-477333 / Fax +39 0124-477303

- a) Employees, assimilated personnel, and collaborators of the Data Controller, who will act as authorized persons for processing personal data (e.g., employees in the Purchasing/Administration department, system administrators);
- b) Third parties that the Data Controller uses for the execution of the contract;
- c) Consultants, credit institutions for accounting-administrative purposes, companies owning IT platforms that manage the purchasing process, credit rating agencies, and other entities acting typically as data processors;
- d) Entities, bodies, or authorities to whom it is mandatory to communicate your personal data by law or by orders from authorities.

The entities in the above categories may, in some cases, act independently as separate Data Controllers, and in other cases, as Data Processors appointed by the Data Controller, in compliance with Article 28 of the GDPR.

5. WHERE YOUR PERSONAL DATA IS STORED

Personal data are stored in both paper-based and electronic archives, on servers located in Italy or within the European Union.

6. HOW YOUR DATA IS PROTECTED

To protect your personal data, the Data Controller adopts appropriate technical and organizational security measures in compliance with the GDPR. In particular, suitable IT security measures have been implemented to minimize the risks of destruction, accidental loss, unauthorized or illegal access to your data, as well as appropriate organizational measures to prevent violations, misuse, incorrect or non-compliant use of your data in relation to the purposes for which they were collected.

7. HOW LONG YOUR PERSONAL DATA WILL BE STORED

Personal data will be stored for the entire duration of the contractual relationship in compliance with legal obligations related to the retention of accounting records (10 years under Article 2220 of the Civil Code) or, if longer, in accordance with the statutory limitation periods provided by our legal system. After this period, and unless there is a need to retain such data to ascertain, exercise, or defend a right in judicial proceedings, SFRG will proceed with their deletion.

8. YOUR RIGHTS

In relation to the processing activities described in this Privacy Notice, as the Data Subject, you can exercise, free of charge, the rights set out in Articles 15 et seq. of the GDPR, and in particular:

- Right of access – the right to obtain confirmation of whether or not personal data concerning you are being processed, and if so, to access your personal data, including a copy of them;
- Right to rectification – the right to obtain, without undue delay, the rectification of inaccurate personal data concerning you and/or the completion of incomplete personal data;
- Right to erasure (right to be forgotten) – the right to obtain, without undue delay, the erasure of personal data concerning you;
- Right to restriction of processing – the right to obtain the restriction of processing, when the legal conditions apply;
- Right to object – the right to object, at any time, to the processing of personal data concerning you, based on the legitimate interest condition, including profiling, unless there are legitimate reasons for the Data Controller to continue the processing, which prevail over the interests, rights, and freedoms of the Data Subject, or for the establishment, exercise, or defense of a legal claim;
- Right to lodge a complaint with the Supervisory Authority – the right to file a complaint with the Data Protection Authority through the dedicated forms available on the website <https://www.garanteprivacy.it/home/diritti/come-agire-pertutelare-i-tuoi-dati-personali>, if you believe that the processing of your personal data has occurred in violation of the GDPR.

9. HOW YOU CAN EXERCISE YOUR RIGHTS

For any request related to this privacy notice or the operations described here, including the methods of processing your data, as well as to exercise the rights granted to you by the GDPR, as mentioned above, you can send a communication to the Privacy Service of SIDERFORGEROSSİ GROUP SPA, via Cartiera di Mezzo n. 38, 36011, Arsiero, also by email to privacy@siderforgerossi.com.

Siderforgerossi Group SpA



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