

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

The personal data collected by the Data Controller are only those relevant and not excessive in relation to the purposes of the processing and, therefore, only the data necessary to establish contact and assess the opportunity to develop business relationships, and in general, business opportunities; for example, name, surname, job position, email, and phone number. SFRG will process your personal data collected to establish contact and assess the opportunity to develop business relationships, and in general, business opportunities, in compliance with the applicable data protection laws and the confidentiality obligations that guide SFRG activities.

2. PURPOSES OF THE PROCESSING AND LEGAL BASIS

Developing Business Relationships: the data will be processed to establish contact, build relationships, and assess the opportunity to develop commercial relationships and, in general, business opportunities. The legal basis for the processing is the need to respond to your requests and take measures prior to and in preparation for the execution of a potential contract, as well as to comply with related legal obligations. The legal basis for processing your personal data is Article 6, paragraph 1, letter f) of the GDPR, for the pursuit of the legitimate interest of the Data Controller, as it is connected and instrumental to the development of the relationship between you and the Data Controller, the negotiation, and the establishment of a potential contractual relationship. Therefore, the refusal to provide the data may result in the inability to establish commercial contacts and negotiate a contract.

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

The data will be processed by the Data Controller and by individuals designated by the Data Controller (for example, those responsible for commercial, administrative, legal functions, and information systems management) and may be disclosed to third parties only when necessary for the performance of the activities described in Paragraph 2 above. The third-party recipients of the data, whether independent data controllers or data processors, are individuals or entities that provide professional assistance/consulting services and service delivery on behalf of or for the benefit of the Data Controller.

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.

Siderforgerossi Group SpA

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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.

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• 10080 BUSANO CANAVESE [TO] - Via Rolando Perino, 37 - Via Stefano Bruda, 39- Tel. +39 0124-477333 / Fax +39 0124-477303

7. HOW LONG YOUR PERSONAL DATA WILL BE STORED

The data will be kept for the time strictly necessary to achieve the purposes for which they were collected and may be stored for a longer period due to legal obligations or based on the user's consent.

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.

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