

**PRIVACY POLICY PURSUANT TO ART. 13 OF EU REGULATION 2016/679
For customers and their representatives**

Data protection is a very serious matter for us, so we would like to inform you about the ways in which data is processed and the rights you can exercise under current data protection legislation, in particular EU Regulation 2016/679 (hereinafter also: "GDPR").

1. Data Controller

Umpi S.r.l.

Registered Office:

Via Consolare Rimini S Marino, n. 11, 47923, Rimini (RN)

Phone: +39 0541 833160

E-mail: privacy@umpi.it

2. The categories of data that are processed

The categories of "personal data" (ex. Art. 4.1 of the GDPR) processed by the Data Controller may be, by way of example but certainly not exhaustive:

- Personal and identification data (such as, by way of example, name and surname, date of birth, place of birth, nationality, tax code, VAT number, occupation/trade, etc.);
- Contact data (such as, but not limited to, address, e-mail address, telephone number and similar data);
- For Company or Entity representatives, data relating to the role held in the Company or Entity;
- Data relating to the services provided.

3. Lawfulness and purpose of the processing

The processing of personal data is carried out in accordance with the provisions of the General Data Protection Regulation (GDPR) and any other applicable data protection legislation. The details are provided below:

3.1 Purposes for compliance with a legal obligation (ex-Art. 6 (1)(c) GDPR)

- a. Fulfilment of obligations provided for by Laws, Regulations and EU Legislation, or by provisions issued by Authorities or Supervisory and Control Bodies in relation to or in any case connected to the existing and/or future legal relationship.

The retention period of personal data, with regard to the purposes referred to in this section is:

For the purpose: a, 10 years from the end of the contractual or commercial relationship.

These times may be extended in the event of litigation or legal provisions.

3.2 Purposes for the performance of a contract or pre-contractual measures (ex-Art. 6 (1)(b) GDPR)

- a. Execution of pre-contractual activities, also with reference to the first contact and the possible preparation and sending of estimates;
- b. Fulfilment of contractual obligations and legal transactions and in particular of the contract entered into (for example, execution of the order or order, etc.);
- c. Management of administrative, accounting, tax and financial processes related to the provision of the product or service provided;
- d. Protection of contractual rights or in any case deriving from the relationships between the parties. It should be noted that if the protection of rights is not directly connected with the fulfilment of the contract stipulated, the related processing has **as its legal basis the legitimate interest, (pursuant to Article 6 paragraph 1 (f) of the GDPR), of a mandatory nature and deriving from the contractual relationship established between the parties.**

The retention period of personal data, with regard to the purposes referred to in this section is:

For the purpose: a, until the end of the pre-contractual activity;

For the purpose: b, until the end of the contractual relationship;

For the purposes: c, d: 10 years from the end of the contractual relationship.

These times can be extended in the event of a dispute.

3.3 Purposes for the pursuit of a legitimate interest (ex-Art. 6 (1)(f) GDPR)

Where necessary, the processing of personal data is aimed at protecting our legitimate interest or that of a third party.

This will only take place on condition that the rights of the data subject do not prevail. The processing will include the following purpose, in particular:

- a. Carrying out advertising or promotional activities, in the broadest sense of the term (e.g. sending newsletters and information material, requesting brochures, organizing events, etc.) and other marketing activities, through automated (e.g. email) and non-automated (calls with an operator) contact methods, for the purpose of selling products or services similar to the purchases made by the data subject;
- b. Transmission of data to other companies of the DP Business Group, of which the Data Controller is a member, operating in the sectors of industry 4.0 and IT security, for internal administrative purposes and, in particular, for the management and rationalisation of the internal administrative, accounting, tax and financial processes of the Group itself, as well as for the management and full operation of the internal IT infrastructure;
- c. Data processing for statistical purposes (for example, surveys and monitoring, in aggregate form, of data relating to purchases made and revenue centers).

The retention period of personal data, with regard to the purposes referred to in this section is:

For the purpose: a, for the duration of the contractual relationship established and, in any case, up to 24 months from the last purchase made, unless the data subject objects. In this regard, it should be noted that any denial or withdrawal of consent for other marketing purposes, other than the aforementioned purpose a, is not equivalent to opposition to the same and will not result in the cessation of this purpose and related activities.

For the purpose: b, 10 years from the end of the contractual relationship.

For purpose c: for the duration of the contractual relationship established and, in any case, up to 12 months from the last purchase made, unless the data subject objects.

4. Recipients or categories of recipients of personal data (ex-Art. 13 (1)(e) GDPR) *

As part of the aforementioned purposes, the Data Controller may communicate your data to:

- Offices and internal functions of the Data Controller;
- Third-party companies of the DP Business Group, of which the Data Controller is a member, operating in the sectors of industry 4.0 and IT security, limited to purpose 3.3 (b);
- Accounting management consultants and accountants;
- Companies and professional operators that provide IT services, including electronic data processing, software and cloud management, website management and IT consultancy;
- Control and supervisory bodies;
- Firms and professionals in the legal field;
- Companies and professionals in the field of compliance;
- Revenue Agency;
- Public Administrations, Competent Authorities, Public Bodies and Agencies in the context of the execution of their institutional tasks.

** The complete and updated list of Recipients (pursuant to Article 4.9 of the GDPR) is available from the Data Controller at the addresses indicated above.*

5. Recipients or categories of recipients of personal data (ex-Art. 13 (1)(f) GDPR) and transfer of data to non-EU countries

The Data Controller informs you that it has no intention of transferring your data to countries outside the EU and EEA for the purposes indicated above.

6. Rights of the Data Subject (ex-Art. 13 (2)(b) GDPR)

The data subject can assert the following rights:

- right of access of the data subject [art. 15 of the EU Regulation] (the possibility of being informed about the processing carried out on their Personal Data and possibly receiving a copy);
- right to rectification of their Personal Data [art. 16 of the EU Regulation] (the data subject has the right to rectification of inaccurate personal data concerning him/her);
- the right to erasure of their Personal Data without undue delay ("right to be forgotten") [art. 17 of the EU Regulation] (the data subject has, and will have, the right to erasure of their data);
- right to restriction of processing of their Personal Data in the cases provided for by art. 18 of the EU Regulation, including in the case of unlawful processing or contestation of the accuracy of the Personal Data by the data subject [art. 18 of the EU Regulation];
- right to data portability [art. 20 of the EU Regulation], the data subject may request his/her Personal Data in a structured format in order to transmit them to another controller, in the cases provided for by the same article;
- right to object to the processing of their Personal Data [art. 21 of the EU Regulation] (the data subject has, and will have, the right to object to the processing of their personal data);
- right not to be subjected to automated decision-making processes, [art. 22 of the EU Regulation] (the data subject

has, as he or she will have, the right not to be subject to a decision based solely on automated processing).

Further information about the rights of the data subject can be obtained by requesting a full extract of the above-mentioned articles from the Data Controller.

The aforementioned rights can be exercised in accordance with the provisions of the Regulation by sending an e-mail to the following privacy@umpi.it address.

In compliance with art. 19 of the EU Regulation, the Data Controller shall inform the recipients to whom the personal data have been communicated, of any rectifications, cancellations or limitations of processing requested, where possible.

In order to allow a more rapid response to your requests made in the exercise of the aforementioned rights, they may be addressed to the Data Controller by addressing them to the addresses indicated in point 1.

7. Right to lodge a complaint (ex-Art. 13 (2)(d) GDPR)

If the data subject believes that his or her rights have been compromised, he or she has the right to lodge a complaint with the Data Protection Authority, in the manner indicated by the same Authority at the following Internet [address http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524](http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524) or by sending written communication to the Data Protection Authority.

8. Possible consequence of failure to provide data and nature of the provision of data (ex-Art. 13 (2)(e) GDPR)

8.1 In the event of fulfilment of legal or contractual obligations

We inform you that if the purposes of processing have as their legal basis a legal or contractual (or even pre-contractual) obligation, the data subject must necessarily provide the requested data.

Otherwise, it will be impossible for the Data Controller to proceed with the pursuit of the specific processing purposes.

8.2 In case of legitimate interest

Similarly, with regard to the purposes based on a legitimate interest and which do not require consent, the objection of the data subject entails or will make it impossible to proceed with the achievement of the respective purposes and any related services, for which the data subject has objected, without prejudice to compelling legitimate reasons prevailing by the Data Controller or aimed at protecting rights in court.

When the data are no longer needed, they are regularly deleted, if their deletion is impossible or possible only in the face of a disproportionate effort due to a particular storage method, the data cannot be processed and must be archived in inaccessible areas.

9. Existence of automated decision-making (including profiling)

The use of purely automated decision-making processes as detailed in Article 22 of the GDPR is currently excluded. If it is decided in the future to establish such processes for individual cases, you will be notified separately if required to do so by law or update this policy.

10. Processing methods

Personal data will be processed in paper, computerized and telematic form and entered in the relevant databases (customers, etc.) which may be accessed, and therefore become aware, by the employees expressly designated by the Data Controller as Data Processors and Authorized for the processing of personal data, who may carry out consultation, use, processing, comparison and any other appropriate operation, including automated ones, in compliance with the provisions of the law necessary to ensure, among other things, the confidentiality and security of the data as well as the accuracy, up-to-date and relevance of the data with respect to the declared purposes.

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47923 Rimini (RN)
Tel. 0541/833160
E-mail: privacy@umpi.it
(Signature of the Data Controller)

The undersigned _____ declares
to have fully understood the information provided by Umpi S.r.l. as Data Controller.

(Place and date)

(signature of the data subject)