



Customer privacy policy pursuant to art. 13 of the Regulation (EU) 2016/679 and to the current laws

Pursuant to article 13 of the Regulation (EU) 2016/697 (hereinafter also referred to as "Regulation") as well as to the current laws, **Arpa Industriale S.p.A.**, in its capacity as Data Controller, hereby informs you that the personal data you provide shall be processed in a relevant and transparent manner and in compliance with the lawfulness and necessity principles, according to the applicable rules.

Processing purposes and optional transfer of data

In this respect, please be informed that your personal data shall be processed for corporate purposes, either connected to or needed for running our Company business, namely:

- a) fulfilling contractual obligations and complying with any specific requests from you; the provision of data is optional, yet necessary in order to properly fulfil any contractual and pre-contractual obligations. Failure to provide data shall mean that the Data Controller will not be able to duly comply with its own contractual obligations.
- b) complying with tax, accounting, and administrative legal requirements; the provision of data is mandatory and necessary in order to properly fulfil legal requirements. Failure to provide data shall mean that the Data Controller will not be able to duly comply with legal requirements and, as a consequence, to fulfil any relevant agreement.
- c) for statistical purposes. The provision of data is optional. Failure to provide data shall mean that the Data Controller will not be able to use your data to gather statistical information;
- d) for purposes related to the promotion and sale of the Data Controller's products and services (so called marketing purposes). The provision of data is optional. Any refusal to provide data shall mean that the Company will not



be able to use your data for marketing purposes;

e) for the purpose of processing your personal data in order to include you in the relevant categories of data subjects (so called profiling) and send you customised marketing and promotional information by e-mail, fax, and telephone. The provision of data is optional. Any refusal to provide data shall mean that the Company will not be able to identify marketing and promotional information that are in line with your personal characteristics and tastes.

Methods of processing

Personal data shall be processed using electronic, IT or hard copy supports and taking appropriate security measures aimed at ensuring the security and confidentiality of your personal data in observance of the provisions of any applicable laws. As far as profiling activities are concerned, data processing is performed using automated means.

Processing legal basis

The processing legal basis is the existing contractual relation, the law, and the consent you give.

Data retention

Pursuant to the proportionality and necessity principles, data shall be retained for the time necessary to fulfil the above mentioned purposes and, as a result, the service offered or the specific applicable legal requirements.

Data disclosure and dissemination

Personal data collected for the above mentioned purposes shall not be disseminated. However, data shall be disclosed by the Data Controller as set out below:

- to public and private entities that may access data by virtue of legal



- requirements, rules or EU regulations, within the limits set forth by such laws;
- to our consultants, within the limits necessary to perform their task;
 - to companies belonging to the Group, either within or out of the European Union.

Data may be disclosed to Persons tasked with processing/Authorised persons that are the Data Controller's employees.

Data may be transferred to a third-party country. The transfer of your data shall be protected by undersigning Standard Contractual Clauses.

Data subject's rights

The people to whom personal data relate are entitled to obtain confirmation of the existence of such data, to know their content and source, to verify their accuracy or to ask for data to be supplemented, updated or rectified at any time (articles 15 and 16 of the Regulation).

Furthermore, data subjects are entitled to obtain data erasure, restriction of processing, data portability as well as to lodge a complaint with the competent supervisory authority and to object to their processing, for legitimate reasons (articles 17 and ff of the Regulation).

Such rights may be exercised by sending a written notice to:
privacy.arpa@arpaindustriale.com

Data controller

The Data Controller is Arpa Industriale S.p.A. with registered office in Bra (province of Cuneo), via G. Piumati 91.

A list of the External processors shall be made available at the Data Controller's headquarters/published on the Data Controller's website.