

**PRIVACY NOTICE in compliance with articles 13 and 14 of Regulation (EU) 679/2016 - GDPR
PROCESSING SUPPLIER AND CUSTOMER'S DATA (hereinafter "Supplier" and "Customer").**

According to Regulation (EU) 679/2016, the data concerning legal entities, bodies and associations are not "personal data", consequently for their treatment it would not be necessary to comply with the obligations envisaged by the legislation in force regarding the protection of personal data. However, in consideration of the fact that Suppliers/Customers include entities that fall under the definition of "natural persons" (professionals, sole-proprietorships, etc.) and that in the context of the inter-current relationships, personal data relating to natural persons may be processed - e.g. data related to people who have connection with the Supplier (employees, collaborators, etc.) - ECOPOL S.p.A. keeps this document always available, in which all data subjects, even those excluded from the scope of protection of the legislation in question, will be able to recognize the policies adopted in the processing of personal data and information. This will always be based on principles of liability, lawfulness and transparency and in full respect of the right to privacy.

1. DATA PROCESSED:

Only relevant, and not exceeding, data will be processed with respect to the purposes as listed below:

- > Data and information provided directly by the data subject or by persons delegated /authorized by it, and /or related to the contractual relationship established with the Data Controller – administrative-tax data;
- > data related to pre-contractual information (data freely available from public or publicly accessible sources);
- > other data from legitimately accessible sources in relation to the nature of the activities and the purposes indicated below, or from lists/documents acquired from third parties authorized according to specific legislation (e.g.: CCAA - Chamber of Commerce)
- > data originating during the commercial relation relevant to the services and products purchased, timeliness of payments and debt behavior, particular agreements;
- > data acquired or originating during the activities performed upon request/mandate of the Customer, also relevant to third parties which have relations with the Customer.

2. DATA ORIGIN

Except for those data which originate in the organization of the Controller with regard to the Supply and the contractual relationship (quality controls, efficiency assessments, etc.), the assumption and updating of data are usually carried out through the Supplier itself or from public registers, lists, deeds or documents that can be known by anyone or by lists / documents acquired by third parties authorized by virtue of specific legal provisions (e.g.: CCAA – Chamber of Commerce) or by the Supplier itself.

3. WHY DATA CAN BE PROCESSED – legal basis of the processing

The data may be processed, always in relation to the purposes indicated below:

- > when necessary to fulfill obligations arising from a contract to which the data subject is a party, and to the related legal obligations (particularly for the purposes referred to in the following item 4 letters a-b-c);
- > when necessary for the pursuit of legitimate interests of the data controller, consisting in the proper organization and planning of activities and improvement of their service, in the protection of their assets and credit, in processing personal data for direct marketing purposes, always keeping into account the reasonable expectations of the data subject based on their relation with the Controller (particularly for the purposes referred to in the following item 4 letters e-f-g-h);
- > when necessary to assert or defend a right in court or to assess whether there is a right to safeguard in a judicial defense;
- > when coming from public registers accessible to anyone and/or made manifestly public by the data subject (particularly for the purposes referred to in the following item 4 letter e);
- > when the data subject (natural person) has expressed their consent (particularly referred to the use of contact details other than their e-mail address, for the purpose in the following item 4 letter h);

4. PROCESSING PURPOSES

The processing of the personal data, requested or acquired both prior to the establishment of the contractual relationship, or in the course or after the termination of the same, have the following purposes:

- a. the fulfillment of contractual, accounting and tax obligations arising from the business relationship to which ECOPOL S.p.A. and the Mandator are parties; fulfill obligations arising from Community laws, rules and regulations; fulfilment of instructions given by the judicial authorities, financial authorities and insurance institutions;
- b. purposes strictly connected and finalized to the management of relationships with Customers or Suppliers always in relation to the management of the mandate and the activities regulated by it;
- c. preliminary evaluations before establishing a collaboration or a commercial relationship; acquisition of preliminary information for the conclusion of a contract; in case of contracts of high value, the data may be acquired from public registers, lists, deeds or documents that can be known by anyone who needs to assess reliability, ("commercial information");
- d. internal operating and management needs such as customer data management, address books, and statistical calculations;
- e. to protect a legitimate interest, ascertain, assert or defend a right; legal basis: coinciding with purpose;
- f. commercial activity: marketing, promotional activities. Unless otherwise indicated by the Customer, the e-mail addresses provided may be used for sending courtesy communications and/or informative material/offers relating to services similar to those covered by the commercial relationship in force. It is understood that the Mandator has the right to oppose the aforementioned treatment at any time. In this regard, please note that paragraph 4 of art. 130 of Legislative Decree 196/2003 allows the use for this purpose of the e-mail address provided by the data subject when purchasing products or services, provided you do not refuse such use; (legal basis: legitimate interest consisting in processing personal data for direct marketing purposes, always taking into account the reasonable expectations of the data subject based on their relationship with the Data Controller taking into account the relationship with the data subject [art. 6 c.1 lett. f] - Legislative Decree 196/2003 art. 130 c.4];Where the object of the supply involves the presence of the Supplier's personnel in the offices of the Data Controller, all personal data necessary to guarantee an effective access control action and compliance with the regulations on Safety on Work, including processing of special categories of personal data (Article 9 c.1 EU Reg. 679/2016) provided by the Supplier may be applied.

5. DATA PROCESSING and Data Retention

In relation to the aforementioned purposes, the processing of personal data may be carried out using paper, computerized and telematic tools. The processing of personal data will always guarantee the utmost confidentiality, relevance and not-excess with respect to the purposes described above, in terms of registration and data retention periods.

After the end of the contractual relationship, the personal data referred to in this notice will be retained for the time allowed / imposed by the legislation applicable to the specific purpose for which the data are processed. An exception is made for what is provided by the rules on the conservation of administrative documentation, which will be treated in full compliance with the current legislation.

6. DATA PROCESSOR and PERSON ACTING UNDER THE AUTHORITY of THE CONTROLLER

For the aforementioned purposes the data may be processed, always and only within the limits of what is actually necessary to perform their duties, by:

- Officers in administration and management of the purchasing process;
- logisticians for supply management;
- prevention and Protection / Security Service Manager;
- resources designated for the management/maintenance of IT systems - system administrators;
- other employees within the limits of the tasks received and as provided by company procedures;
- Company management;

- Subjects (Companies/professionals), who collaborate as Processor(s) pursuant to art. 28 Reg. UE 679/2016 or who provide services functional to them, such as: tax compliance, accounting, management information systems, financial services, credit recovery. In this regard, it should be noted that these subjects will always be bound to full compliance with the rules and procedures aimed at ensuring the widest protection of personal data adopted and imposed by the Data Controller, and not only in compliance with the regulations in force.

7. SHARING PERSONAL DATA – To whom can data be communicated?

Personal data may be communicated to:

- > Companies related to ECOPOL S.p.A. that share the purchasing process;
- > to any customers/suppliers in relation to contractual and/or legal obligations and/or for public relations purposes;
- > public administrations, for the performance of institutional functions, within the limits established by law and regulations;
- > other organizations/associations/companies/credit institutions for purposes related to the execution of obligations related to and/or connected to the intercurrent relationship;
- > enterprises/consultants who need access to data for purposes that are ancillary to the intercurrent relationship within the limits strictly necessary to perform the tasks assigned to them, such as: assistance in the fulfillment or direct execution of tax / accounting obligations, management of information systems, financial services, organizational / managerial consultancy, obligations required by Legislative Decree no.81 of April 9 2008, n. 81 (“Uniform Occupational Health and Safety Code”);

These Controllers will have full ownership for the processing performed at their facilities, always for the purposes specified above, and will be bound to full compliance with the obligations of privacy and security.

All the communications described above are limited to the necessary data for the Processor(s) to perform their duties and/or to achieve the goals related to the communication itself.

7.1 SHARING PERSONAL DATA ABROAD.

Personal data may be transferred:

- > to the country in which the data subject resides or is located, exclusively in recurrence of the conditions of legitimacy referred to in point 3 and in compliance with the regulations in force (art. 49 EU Reg. 2016/679);
- > towards the Subsidiary Companies interested in the Supplier's/Customer's services/products also located in the USA, contractually bound to apply the same data subject protection measures as guaranteed by ECOPOL S.p.A.

8. DISSEMINATION

Except for specific agreements with the data subject, the data under processing will not be disseminated. Based on specific agreements with the data subject, the Supplier's/Customer's personal data and the typology of supply made, may be disclosed by the Data Controller or by the means which they deem most appropriate, including, but not limited to, internet, newspapers, magazines and other press, TV, brochures, leaflets, catalogues, folders, posters, and within information material. (Adattato all'italiano)

The aims pursued are substantially linked to the requirements of transparency in marketing and communication.

9. COMMUNICATION AND UPDATING OF PERSONAL DATA – WHEN IS IT MANDATORY TO SHARE PERSONAL DATA?

The communication and updating of personal data is mandatory, with regard to the fulfillment of contractual and tax obligations required by current legislation and the performance of obligations arising from the supply or assistance contract. Failure to comply with this obligation by the Supplier would make it impossible for the Controller to accept the supply and to carry out the normal procedures related to the commercial relationship between the data subject and the Enterprise itself.

It is optional to communicate other requested data (e.g. mobile phone, e-mail address, etc.), which are not directly related to contractual obligations but functional to the pursuit of the purposes mentioned in point 3. In the absence of such data there will be no consequences except for the impossibility in managing the current relationship and the activities between the parties at their best.

10. DATA CONTROLLER

The Data Controller (the person or Company that determines how the data will be used and processed and is responsible for the correct handling of all data) is ECOPOL S.p.A. - – Polo Industriale Sergio Marchionne n.1 – 51013 Chiesina Uzzanese (Pistoia) – Tel. +39 0572 286000

11. RIGHTS OF DATA SUBJECTS

With respect to the processing referred to herein, the data subjects (users of the site) have the right:

- ✉ to ask the Data Controller to access their personal data, to correct or erase them, to limit their processing, or to object to their processing;
- ✉ if the processing occurs by automated (computerized) means, on the basis of their consent, the data subject may receive their personal data in a structured format, of common use and legible by an automated device, and/or obtain their direct transmission to another data controller, if this is technically possible;
- ✉ to revoke their consent at any time (without affecting the lawfulness of the processing based on the consent before revocation); the consent in question obviously regards that given for processing carried out on the basis of this presupposition;
- ✉ to lodge a complaint with a supervisory authority: Data Protection Authority - Garante per la protezione dei dati personali Piazza Venezia n. 11 00187 ROMA – Telephone switchboard: (+39) 06.696771
- E-mail: garante@gpdp.it - certified mail - protocollo@pec.gpdp.it.

To enforce their rights, the data subject can address the Data Controller, who can be reached at the contact details indicated above, or by writing to privacy@ecopol.com, always bearing in mind that it will not be possible to communicate personal data on the phone, if there is uncertainty about the caller's identity and that even in other cases the data subject must be identified with certainty.