

Privacy notice in compliance with articles 13 and 14 of regulation (EU) 679/2016 - GDPR - Marketing and Public Relations activities

ECOPOL SpA, in addition to the information already published, makes this document available, where all data subjects will be able to recognize the policies adopted in the processing of information and personal data in the activities of Communication - Marketing and Public Relations.

1. DATA CONTROLLER (who decides *why* , *how* and *to whom* to have the data processed)

The data controller (i.e. the subject who determines the purposes and means of personal data processing and is responsible for processing and ensuring that personal data is processed correctly) is: ECOPOL S.p.A., Polo Industriale Sergio Marchionne n.1 – 51013 Chiesina Uzzanese (PT) – Phone +39 0572 286000.

2. WHICH DATA ARE PROCESSED and their origin

- ↳ data provided by the data subject directly or through subjects authorized by them and therefore not listed here (eg: contact details, complaints and reports, etc.);
- ↳ Profiles relating to interests and consumption habits originating, only with the consent of the data subject, through the data provided by them, by the data relating to their relations with ECOPOL S.p.A. and the data relating to navigation on our websites (please refer to the cookies policies published)
- ↳ data relating to the relationship between the data subject and ECOPOL S.p.A (e.g.: purchased services, etc.);
- ↳ data related to any requests from data subjects;
- ↳ information possibly acquired by the data subject during interviews/market surveys carried out by any means (paper questionnaires, telephone interviews, compilation of online forms, etc.);

2.1 Source of the data used to activate a first contact

In addition to what is indicated in the previous item, the contact details used to activate the first contact with subjects who are not or have not been our customers/users or who have not subscribed to our newsletter and information to evaluate their interest in our communications (membership institution, activity, etc.) can be sourced:

- ↳ from the data subject (following contacts with them, for example on the occasion of events) or subjects authorized by them, such as, for example, the institution to which they belong;
- ↳ from public registers, lists, deeds or documents that can be accessed by anyone, paying attention to selecting contact details which, due to the activity carried out or the organization to which they belong or the other information published, may reasonably have an actual interest in the contents of our corporate communications, both through official channels (web/printed media), and through social network channels;
- ↳ from lists purchased from third parties authorized and entitled to communicate data to us for these purposes;

3. WHY THE DATA ARE PROCESSED - PURPOSES AND LEGAL BASES OF THE PROCESSING

The processing of the personal data has the following purposes, for each of which the "legal basis" that makes it possible is indicated in brackets [the "legal bases" are the conditions indicated by EU Reg. 2016/679 in articles 6 and 9, which make a purpose and the related treatments admissible according to current legislation] :

- a. activate an initial contact in order to request an expression of interest from the data subjects and comply with the obligations imposed by the legislation relevant to protection of personal data; [legal bases: fulfillment of articles 13-14 and 6 c.1 lett. a EU Reg. 2016/679 - legitimate interest of the owner, consisting in the activation of a first contact with subjects potentially interested in their product];
- b. business: marketing, advertising, promotional activities. In particular, the contact details, postal and e-mail addresses may be used to send courtesy communications and/or promotional/informative material on commercial initiatives relating to ECOPOL S.p.A. products and services ; [legal bases: legitimate interest consisting in processing personal data for direct marketing purposes taking into account the relationship with the data subject [art. 6 c.1 lett. f] - Legislative Decree 196/2003 art. 130 c.4 - consent of the data subject (natural person) art. 6 c. 1 lit. to EU Reg. 2016/679];
- c. carry out market surveys to improve our products/services; [legal basis: legitimate interest of the owner consisting in the efficient organization of the activities art. 6 c.1 lett. f];
- d. satisfy inquiries from data subjects. [legal bases: contractual-legal fulfillment - art. 6 c.1 lett. B-c- art. 9 c. 2 lett b-h EU Reg. 2016/679 - legitimate interest of the data subject coinciding with the object of their request - art. 6 c.1 lett. f];

4. HOW THE DATA ARE PROCESSED AND STORAGE TIME LIMIT

In relation to the abovementioned purposes, the processing of personal data may take place with paper, digital and telematic tools. Always guaranteeing the most absolute confidentiality, relevance and non-excess with respect to the purposes described above, in terms of registration and data retention periods.

E-mail addresses and other contact details for which the data subject has granted use also for commercial purposes will be kept for 12 months following the last sending/contact with the data subject or the revocation of consent. In this last case, for the data subjects who do not have a contractual relationship with the Data Controller, in order to satisfy the request of the data subject and not to repeat, even incidentally, unwanted communications.

In case of failure to reply to the first request for consent, the e-mail addresses obtained from public or publicly accessible sources will be included in a black list where they will remain for 12 months, always in order not to repeat unwanted communications, even incidentally.

5. BY WHOM THE DATA MAY BE MANAGED

For the same purposes, the data may be processed by the following categories of delegates and/or managers, always and only within the limits of what is actually necessary to carry out their functions, by:

- ↳ commercial employees and information systems management staff;

☞ external subjects who are our consultants or suppliers, involved in the above activities, appointed as managers (Article 28 of EU Reg. 2016/679) or employed according to the provisions of article 29 of EU Reg. 2016/679 and art. 2 quaterdecies Legislative Decree 196/2003;

6. TO WHOM THE DATA MAY BE COMMUNICATED/DISCLOSED

the personal data in question may be communicated or made available:

- ☞ to the subjects indicated by the data subject or by a person acting on their behalf;
 - ☞ to subjects who can access the data by virtue of the law, regulation or community legislation, within the limits set by these rules;
 - ☞ to other subjects (companies/consultants) who need to access some data for purposes related to the organization of events or the execution of market surveys or who provide services related to the aforementioned purposes such as: electronic communication or mail delivery ;
- which will hold full ownership for the treatments carried out at their facilities, always for the purposes specified above, and which will be bound to full compliance with the obligations imposed by the legislation in question.

7.1 Sharing Personal Data Abroad

Personal data may be transferred:

- > to the country in which the data subject resides or is located, only in the event of the legitimacy conditions referred to in item 3 and in compliance with current legislation (Article 49 of EU Reg. 2016/679);
- > towards subsidiary companies, joint data controllers, also located in the USA, contractually required to apply the same protection measures for the data subjects as guaranteed by ECOPOL S.p.A;

7.2 Dissemination

The data in question will not be disseminated.

8. WHEN IT IS MANDATORY TO COMMUNICATE ONE'S DATA

The communication and updating of personal data, as well as the consent to their treatment, when requested, are obviously optional in nature. In the absence thereof, there will be no consequence except for the fact that the data subject cannot be involved in the initiatives promoted by ECOPOL S.p.A. Please note that any consent given may be revoked at any time without this affecting the lawfulness of the processing carried out before the revocation.

9. RIGHTS OF THE DATA SUBJECT - WHO YOU CAN CONTACT

The data subject has the right:

- > to ask the data controller to access their personal data and correct or cancel them or limit the processing of personal data concerning them and to oppose their treatment;
- > if the treatment is carried out by automated digital tools and on the basis of one's consent, to receive personal data concerning them in a structured format, commonly used and readable by an automatic device and/or to obtain direct transmission to another data controller, if technically possible;
- > to revoke their consent at any time (without prejudice to the lawfulness of the treatment based on the consent before the revocation), obviously this for the treatments carried out on the basis of this assumption;
- > to lodge a complaint to the Italian Supervisory Authority: Garante per la protezione dei dati personali - Piazza di Venezia n. 11 00187 ROME - Telephone switchboard: (+39) 06.696771 - E-mail: garante@gpdp.it - certified mail protocollo@pec.gpdp.it.

To enforce their rights, the data subject can contact the Data Controller, who can be reached via the contact details indicated above or by writing to privacy@ecopol.com bearing in mind that personal data cannot be communicated by telephone where there is no certainty about the identity of the interlocutor, and that also in other cases the data subject must be identified with certainty.