

INFORMATION FOR CUSTOMERS AND SUPPLIERS REGARDING THE PROCESSING OF PERSONAL DATA

Pursuant to Legislative Decree No. 196/2003 and EU Regulation No. 679/2016 (GDPR), and in relation to the personal data concerning you that will be processed, we inform you of the following.

1. PERSONAL DATA PROCESSED, PURPOSES AND LEGAL BASIS OF THE PROCESSING

" Personal Data" means any information relating to identified or identifiable natural persons processed by Ormamacchine S.p.A. for the purpose of entering into and performing contractual relationships with its customers/suppliers. Such data include, by way of example, data directly relating to the customer/supplier who is a natural person, or to the legal representative of the customer/supplier who is a legal entity, as well as data relating to the employees/consultants of the same involved in activities connected with the contract, and any other information necessary for the performance of the contract.

In particular, such Personal Data shall be processed for the purposes set out below.

A. Management of the contractual/commercial relationship, including: meeting specific requests made by the customer/supplier prior to the conclusion of the contract; entering into, amending and performing the contract; provision and management of related services; handling of complaints.

The legal bases for processing in relation to the aforementioned purposes are:

- The performance of a contract and/or the implementation of pre-contractual measures adopted at the request of the data subject, with reference to contracts entered into directly with the data subject;
- The legitimate interest of the Data Controller (namely, the management and performance of the contractual relationship) with reference to the processing of personal data relating to the employees and/or consultants of the customer/supplier involved in the activities governed by the contract.

B. Administrative and accounting purposes, such as: invoicing, payment management, accounting management, and organization of business activities.

The legal bases for processing in relation to the aforementioned purposes are:

- The need to comply with legal obligations to the maintenance accounting records;
- Legitimate interest in the administrative management of the contractual relationship.

C. Fulfillment of legal obligations under national or European Union law or collective agreements in accordance with national law, such as: fulfillment of obligations under EU and national regulations, particularly regarding health and safety at work and crime prevention (including anti-mafia and anti-corruption legislation, Legislative Decree 231/2001).

The legal basis for processing is the need to fulfill a legal obligation to which the data controller is subject.

D. Exercise and/or defense of legal claims and debt collections, such as: management of any legal disputes, protection and collection of debts, directly or through third parties (lawyers/agencies/debt collection companies).

The legal basis for processing is legitimate interest.

2. RETENTION PERIOD

The data will be processed for the duration of the contractual relationship and, after its termination, until the Expire of the statute of limitations for any rights arising between the parties. In the event of judicial disputes, data will be retained for the entire duration of the dispute and until the final judgment becomes res judicata.

3. METHODS OF DATA PROCESSING

The processing of personal data may be carried out using both paper-based and electronic or otherwise automated means, in ways and procedures strictly necessary to achieve the purposes described above.

4. SCOPE OF DISCLOSURE AND AUTHORIZED DATA PROCESSORS

Data may be disclosed to external parties acting as independent data controllers, such as public or private entities legally entitled to process the Data (e.g., public administrations, banks and credit institutions, accountants, notaries, lawyers, and other professionals).

Data may also be processed, on behalf of the data controller, by external parties appointed as data processors, who perform specific activities on behalf of the controller, including, by way of example, the distribution network, companies and agents carrying out debt collection activities for the controller, and legal, tax, and administrative consultants.

Data may be processed by employees of the company functions responsible for pursuing the purposes described above, provided that they have been expressly authorized to process such data and have received adequate operational instructions.

Personal Data are not subject to dissemination

5. PROVISION OF DATA

The data subject's refusal to provide Personal Data may result in the partial or total impossibility of fulfilling legal obligations, or of entering into or properly executing the contract or service. In such cases, while the data subject retains the right not to provide their data, the Data Controller reserves the right to suspend, terminate, or not establish the contractual relationship.

6. DATA CONTROLLER

The Data Controller is Ormamacchine S.p.A., Tax Code 00592610166 and VAT number 00592610166, with registered office at Viale Lombardia n. 47, 24020 - Torre Boldone (BG), email: privacy@ormamacchine.it

The Data Controller may process Personal Data directly, through its duly authorized employees, or through external collaborators, who in such cases act as Data Processors.

The updated list of Data Processors is made available by the Data Controller upon request.

7. DATA SUBJECT RIGHTS

Under the personal data protection legislation (Articles 12–22 of EU Regulation 2016/679), the data subject has the right to be informed about the processing of their Personal Data and the right to access such data at any time, as well as to request its update, completion, and rectification. Where the conditions provided by law are met, the data subject may also exercise the right to the erasure of data, restriction of processing, data portability, objection to processing, and not to be subject to decisions based solely on automated processing.

Where the processing of Personal Data is based on the data subject's consent, the data subject has the right to withdraw such consent at any time.

To exercise their rights or to obtain more detailed information about data processing, the data subject may contact Ormamacchine S.p.A. via email at privacy@ormamacchine.it.

If the data subject believes their rights have been violated, they may lodge a complaint with the Italian Data Protection Authority

8. PROCESSING OF THIRD PARTY DATA

The customer/supplier is informed that, if they make use of their own employees or collaborators (including any subcontractors) in executing the contractual relationship, the Personal Data of such individuals may be processed by Ormamacchine S.p.A., in its capacity as Data Controller, for the purposes described in Section 1. Such processing is subject to the same purposes, methods, and retention periods described in this privacy notice; furthermore, the individuals concerned have the same rights identified in Section 7.

The customer/supplier is responsible for properly informing their employees and collaborators about the above processing, including by providing them with a copy of this privacy notice.