

INFORMATION POLICY AND CONSENT FOR CUSTOMERS

pursuant to Art. 13 of EU Regulation No. 2016/679

This document describes the purposes and methods of processing personal data of **ALU-PRO S.r.l.** Customers (hereinafter referred to as the “Company”)

Pursuant to Art. 13 of EU Regulation No. 679/2016, **ALU-PRO S.r.l.**, represented by its Legal Representative, with registered office in **Via Einstein, 8 – Z.I. Noale 30033 (VE), Italy**– alupro@alupro.it T. **+39 041 5897311** F. **+39 041 5897320**, as Data Controller, informs that, for the establishment and execution of the current contractual relationships with you, owns your personal data acquired also verbally directly or through third parties.

Purposes for which we need the data of the Data Subject (Art. 13, 1st paragraph of the GDPR)

The data are processed in relation to the contractual requirements and to the consequent fulfillment of legal, contractual and legal obligations deriving from them.

- *entry and processing of data for the purposes of drafting mandatory accounting records*
- *drafting of tax and administrative documents regarding the sale of goods and services or the like; as well as to achieve effective management of commercial relations.*

The legal basis of this processing is the performance of the services relating to the contractual relationship and the compliance with legal obligations.

How we process the data of the Data Subject (art. 32 of the GDPR)

The Data Controller provides for the use of adequate security measures in order to preserve the confidentiality, integrity and availability of personal data of the Data Subject and imposes similar security measures on third party suppliers and Data Processors.

Where we process the data of the Data Subject

The personal data of the Data Subject are stored in paper, computerized and telematic archives located in countries where the GDPR (EU countries) is applied.

What happens if the Data Subject does not provide his/her data identified as necessary for the execution of the requested service (Art. 13, 2nd paragraph, subpara. e of the GDPR)

The conferment of the data is mandatory for all that is required by legal, contractual and legal obligations; therefore, any refusal to provide them or to their subsequent processing may make it impossible for the Undersigned to proceed with the contractual relationships;

On the other hand, failure to provide all data that is not attributable to legal, contractual and legal obligations will be evaluated from time to time by the Undersigned and will determine the consequent decisions related to the importance of the data requested with respect to the management of the business relationship.

Communication to third parties and categories of recipients (Art. 13, 1st paragraph of the GDPR)

Without prejudice to the processing by the Data Controller and the Data Processors expressly authorized by a formal written appointment, the communications and disclosure carried out in compliance with legal obligations, the data may be disclosed in Italy to:

- *the financial administration and to the authorities of Public Security;*
- *tax, legal and accounting professionals and consultants;*
- *trade and local associations;*
- *companies or credit recovery agencies for actions related to the recovery;*
- *companies, organizations, consortia, or other organizations, with the purpose of insurance, financial intermediation, banking and the like, which, in turn, can communicate the data or grant access within the scope of their members, users or entitled beings;*
- *banks or credit institutions in the financial management of the Company;*
- *companies working in the transport industry for the conduct of the normal commercial relationship with you.*

The Data Controller requires third-party suppliers and Data Processors to comply with security measures equal to those

implemented in relation to the Data Subject by restricting the scope of action of the Data Processor to processing related to the requested service.

The Data Controller does not transfer personal data to countries where the GDPR is not applied (countries outside the EU) unless specifically indicated otherwise for which the Data Subject will be informed in advance and his/her consent will be requested if necessary.

The legal basis of this processing is the performance of the services inherent in the relationship established, compliance with legal obligations and the legitimate interest of the Company to carry out processing necessary for these purposes.

How long are the data of the Data Subject kept (Art. 13, 2nd paragraph, subpara. a of the GDPR)

The data will be processed for the entire duration of the established contractual relationships and also subsequently for the completion of all legal obligations as well as for future commercial purposes similar to the services provided by our Company.

In particular, they will be kept for the entire duration of your registration and in any case no later than a maximum period of 12 (twelve) months.

In addition, personal data will in any case be kept for the fulfillment of (i.e. tax and accounting) obligations that remain even after the termination of the contract (Article 2220 of the Italian Civil Code); for these purposes, the Data Controller will only keep the data necessary for the related fulfillment.

The cases in which the rights deriving from the contract and / or the personal data registration are asserted, in which case the personal data of the Data Subject, exclusively those necessary for such purposes, will be processed for the time necessary to their fulfillment.

How and when the Data Subject may object to the processing of his/her personal data (Art. 21 of the GDPR)

For reasons related to the particular situation of the Data Subject, he/she may object at any time to the processing of his/her personal data if such request is based on legitimate interest or if the above occurs for commercial promotion activities, sending the request to the Data Controller at the address alupro@alupro.it.

The Data Subject has the right to the cancellation of his/her personal data if there is no legitimate prevailing reason of the Data Controller with respect to that which gave rise to the request, and in any case in the event that the Data Subject has opposed the processing for commercial promotion activities.

To whom can the complaint be propose (Art. 15 of the GDPR)

Without prejudice to any other administrative or judicial action, the Data Subject may submit a complaint to the competent control authority in the Italian territory (Guarantor Authority for the protection of personal data) or to the one that carries out its tasks and exercises its powers in the Member State where the violation of the GDPR occurred.

What are the rights of the Data Subject (Articles 15 - 20 of the GDPR)

With regard to the data, you can exercise, by simple communication to be sent to the address shown above, the rights provided by Art. 15 – 20 of the GDPR:

a) confirmation that personal data concerning him/here are being processed and, in this case, to obtain access to personal data and the following information:

1. the purposes of the processing;
2. the categories of personal data in question;
3. the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular, if they are recipients of third countries or international organizations;
4. when possible, the period of storage of personal data provided or, if this is not possible, the criteria used to determine this period;
5. the existence of the Data Subject's right to request the Data Controller to rectify or cancel his/her personal data or limit the processing of his/her personal data concerning him/her or to oppose their processing;
6. the right to lodge a complaint with a supervisory authority;

7. if the data are not collected from the Data Subject of all available information on their origin;
8. the existence of an automated decision-making process, including profiling and, at least in such cases, significant information on the logics used, as well as the expected importance and consequences of this processing for the Data Subject.
9. the appropriate guarantees provided by the third country (outside the EU) or an international organization to protect any data transferred

b) the right to obtain a copy of the personal data subject to processing, provided that this right does not infringe the rights and freedoms of third parties; in the event of further copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs

c) the right to obtain from the Data Controller the rectification of inaccurate personal data concerning him/her without unjustified delay

d) the right to obtain from the Data Controller the cancellation of personal data concerning him/her without unjustified delay, if the reasons provided by the GDPR in Art. 17, among which, for example, in the event that they are no longer necessary for the purposes of the processing or if this is assumed to be illegal, and always if there are the conditions established by law; and in any case if the processing is not justified by another equally legitimate reason;

e) the right to obtain the processing limitation from the Data Controller, in the cases provided for by Art. 18 of the GDPR, for example, where you have disputed the accuracy, for the period necessary for the Data Controller to verify their accuracy. The Data Subject must be informed, in due time, even when the suspension period has been completed or the reason for the limitation of the processing has ceased, and therefore the limitation has been revoked;

f) the right to obtain communication from the data controller of the recipients to whom requests for corrections or cancellations or limitations of processing have been sent, unless this proves impossible or involves a disproportionate effort.

g) the right to receive in a structured format, commonly used and readable by an automatic device, the personal data concerning him/her and the right to send such data to another data controller without hindrance by the Data Controller to whom he/she supplied them in the cases provided for by Art. 20 of the GDPR, and the right to obtain direct sending of personal data from one data controller to another, if technically feasible.

For any further information and in any case to send the request, the Data Subject must contact the Data Controller at the address alupro@alupro.it or the Data Processor at dpo@alupro.it. In order to guarantee that the above-mentioned rights are exercised by the Data Subject and not by unauthorized third parties, the Data Controller may request him/her to provide any additional information necessary for the purpose.