

DISCLOSURE ON PERSONAL DATA PROCESSING

Dear Customer,

Ingemar Srl, with registered office in Via Fabio Filzi no. 19, Milan (MI), as owner of the processing of personal data (hereinafter the “Data Controller” or “Ingemar”), issues this disclosure to the Data Subject in compliance with the European and Italian regulations on personal data protection.

Legal basis and purpose of the processing

The Data Controller processes the personal data for the following purposes:

- 1) to adopt the precontractual measures requested by the Data Subject such as the sending of information on products or services (including the sending of brochures, catalogues and/or other company information) or quotations, as well as to fulfil the contractual and regulatory obligations arising from the business relationship established with the Data Subject and, in general, to correctly manage this relationship, including verification of solvency and management of any disputes;
- 2) to use the email address of the Data Subject to send invitations to events in which the Data Controller will participate: it should be noted that these communications are only sent to customers or potential customers with whom Ingemar has had direct contact, for example, during events or activities carried out by its agents, and therefore it is considered that such mailings respond to a legitimate interest of Ingemar itself.

Consent is not required in all cases because such processing is necessary for the pursuit of the aforesaid purposes, it being understood that the Data Subject can at any time object to the receipt of invitations to trade fairs or other events.

Data retention period

The Data Controller intends to process the data according to the following time criteria:

- ✓ if information is requested, the data will be processed for the time necessary to respond and, subsequently, for a maximum period of three months; however, if a quotation is requested, the data will be processed for a maximum of five years;
- ✓ if the Data Subject becomes a customer of the Data Controller, the data will be processed for the entire duration of the business relationship, and subsequently, to fulfil all related or ensuing obligations, for the period of time prescribed by law and according to the period of prescription of the rights arising from the business relationship;
- ✓ for the purposes referred to in point 1), the data will be processed for 24 months from the last communication, without prejudice to the possibility for the Data Subject to object to the receipt of invitations.

In any case, this is without prejudice to further retention for the time necessary to resolve (or settle) any disputes that may have arisen.

Nature of data provision and consequences of refusal to provide data

The provision of data for the purposes referred to in point 1) is necessary, and therefore any refusal to provide said data in whole or in part may make it impossible for the Data Controller to pursue the above purposes. The provision for further purposes is optional: failing this, the Data

Controller may not be able to carry out the corresponding activities, but will still be entitled to pursue the purposes referred to in point 1).

Categories of recipients

The Data Controller will not disclose the data, but intends to communicate them to internal figures authorised to process them by reason of their respective tasks, as well as to sales agents, credit institutions, credit insurance companies, credit recovery companies, commercial information companies, factoring companies, consulting firms, associations and/or business organisations, professionals or service companies as well as public and private bodies, also as required by inspections and audits.

Should these recipients process data on behalf of the Data Controller, they will be appointed as Data Processors through an appropriate agreement or legal document.

Transfer of data to a third country and/or international organisation

Personal data will not be transferred to any countries or international organisations outside the European Union.

Rights of data subjects

Data Subjects shall have the right to request the Data Controller to provide access to their personal data and to rectify any inaccuracies, to erase them or limit their processing if the requirements are met, to object to their processing for legitimate interests pursued by the Data Controller, as well as obtain the portability of personal data only if they have been processed by automated means based on consent or on a contract. The Data Subject also has the right to withdraw the consent given for the processing purposes that require it, without this affecting the lawfulness of the processing carried out until the moment of withdrawal.

The Data Subject can exercise his or her rights by completing the form available at <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and sending it to: treviso@ingemar.it. The Data Subject also has the right to lodge a complaint with the competent Supervisory Authority, i.e. the Italian Data Protection Authority (www.garanteprivacy.it).