

Dear Customers

SUBJECT: Privacy Policy pursuant to art. 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 provides for the protection of individuals and other entities with regard to the processing of personal data.

According to the law, this processing will be based on principles of propriety, lawfulness and transparency and protection of your privacy and your rights.

In order to allow **INGRANAGGI MOREALI SPA** to fully carry out its activities, you must provide the personal information necessary to fulfil the contractual relationship established/to be established.

In accordance with art. 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, we would therefore like to provide you with the following information regarding our processing of your data:

1. Purposes of the processing

Your personal data, freely provided by you and acquired by us, will be processed in a lawful and correct manner for the provision of services and products that our Company offers to its customers.

Your data will be processed for purposes related to the management of ordinary contractual and commercial relations, and more precisely for the keeping of accounts, invoicing, management of receivables as well as for the satisfaction of all obligations under applicable laws.

2. Method of processing

The data will be processed mainly by manual, electronic, computer and online means with logic strictly related to the purposes specified above, and will be stored on both digital and paper media and on any other suitable media, in compliance with the security measures envisaged in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

3. Mandatory or optional nature of the provision of data and consequences of a refusal to respond

In accordance with art. 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, we also point out that any refusal to provide data at the time of collecting the information could result in the objective impossibility of our company to comply partially or fully with the obligations of law and/or contract related to contractual obligations existing/to be established and that therefore the relationship may not be validly established and/or continued.

4. Disclosure of data to third parties:

1. Your data may be known and processed by the Data Controller, by any data processors designated as well as by the internal data processors designated for this purpose, who will in any case be bound to professional secrecy and maximum confidentiality regarding them.
2. Your data may be disclosed to third parties exclusively for technical and operational purposes strictly related to the purposes set out above, and in particular to the following categories of parties:
3. From/to bodies, professionals, companies or other structures entrusted by us with the processing for the fulfilment of administrative, accounting and management obligations connected with the ordinary performance of our business, as well as for payment collections.
4. From/to companies, organisations or consortia, professionals that provide this company with consulting and/or processing services or that perform activities that are instrumental to those of our company, and in particular by our lawyers and consultants in general.
5. From/to public authorities and administrations for purposes related to the fulfilment of legal obligations.
6. From/to public and private social security institutions to whom the transfer of your data is necessary for the performance of our company's business in relation to our fulfilment of contractual/commercial obligations to you.
7. From/to banks, financial institutions or other entities to whom the transfer of your data is necessary for the performance of our Company's business in relation to our performance of contractual/commercial obligations to you.
8. From/to parties to whom the right to access personal data is recognised by law or by secondary or community regulations, as well as by duly signed specific contracts and agreements.
9. From/to parties to whom the communication of personal data is necessary or in any case necessary for the fulfilment of existing contractual obligations.

5. Dissemination of the data

The personal data are not disseminated.

6. Transfer of data abroad

If necessary and in accordance with current legislation, your data may be exported to countries belonging to the European Union if the transfer is necessary for the performance of obligations arising from existing relationships. Furthermore, if necessary your data may be exported to a third country in accordance with current legislation. In such cases the third country will be a country for which an adequacy decision by the Commission exists.

7. Duration of data retention

Your data will be processed for the entire duration of the contractual relationship and in any case until the extinction of the procedure under which they were acquired, and then will be kept for five years (5 years) from the last processing for purposes related to or instrumental for the activity carried out by the Agency, and in particular for accounting purposes, or for a decade (10 years) for evidence and documentation for tax purposes, excluding any possible use for personal reasons and any possible use in conflict with the customer, and without prejudice to any other provision of applicable law.

8. Right to access personal data and other rights [Art. 15-22 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016]

The data subject has the right to obtain confirmation of the existence or otherwise of personal data concerning him/her, even if not yet recorded, and their disclosure in an intelligible form.

The data subject has the right to be informed of: the origin of the personal data, the purposes and methods of their processing, the logic applied in case of processing with the help of electronic means, the identification of the data controller, manager and representative may be designated, the parties or categories of parties to which the personal data may be disclosed or who can learn about them as appointed representative in the territory of the state, managers or agents.

The data subject has the right: to the updating, rectification or, when interested, completion of data, their cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; certification that the operations requested have been brought to the attention – including as regards their content – of those to whom the data were disclosed or disseminated, unless this requirement proves impossible or involves an effort manifestly disproportionate to the right being protected.

The data subject has the right to object in whole or in part for legitimate reasons: to the processing of his/her personal data, even though they are relevant to the purpose of the collection; to the processing of his/her personal data for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communications.

9. Privacy Policy, consent, modification or withdrawal of consent and their effects

If several legal transactions are carried out, this policy and any consent given shall also apply to subsequent legal transactions.

At any time the data subject can modify or withdraw any consent that was previously expressed, using the same methods used to previously communicate consent.

Withdrawal of consent shall not affect the lawfulness of any processing based on the consent given prior to withdrawal.

10. Possibility of reporting to and/or lodging a complaint with the Personal Data Protection Authority

If it is believed that there has been a violation of the rules regarding the protection of personal data, the data subject can submit a report to and/or lodge a complaint at any time with the Personal Data Protection Authority using the method below deemed most appropriate:

a) registered letter with return receipt addressed to the Personal Data Protection Authority, Piazza di Monte Citorio 121, 00186 Rome.

b) email: urp@gpdp.it, or urp@pec.gpdp.it.

c) fax 06/69677.3785.

For details on how to submit the report and/or complaint and the payment of the related fees, the data subject should consult the website www.garanteprivacy.it

11. Data Controller and Data Processor

The Data Controller is: **INGRANAGGI MOREALI MARIO SPA** - Registered office: Via Carlo Cafiero 16 - 42124 REGGIO EMILIA - Tel. (+39) 0522300641 – Fax (+39) 0522930340 – email: personale@moreali.it - VAT number 00674710355, in the person of its legal representative pro tempore GIANFRANCO MACCA.

The data processor is GIANFRANCO MACCA. The contact details are the same as those of the data controller.

Sincerely

The Data Controller
(stamp and signature)