

CUSTOMER PRIVACY NOTICE

Dear Customer,

Giacomini S.p.A., with registered office in Via per Alzo 39, 28017 San Maurizio D'Opaglio (NO), in its capacity as Data Controller and pursuant to EU Regulation 2016/679 (General Data Protection Regulation – hereinafter GDPR), provides this notice regarding the processing of personal data collected in connection with the contract in place between us. Such processing will be performed in compliance with the principles established by the laws in force.

1. Data Controller, External Processors and Authorized Persons

The Data Controller is GIACOMINI S.p.A., with registered office in Via per Alzo 39, 28017 San Maurizio D'Opaglio (NO), telephone: +39 0322 923111, email: info@giacomini.com.

The updated list of the data processors and persons authorized for this task is available at the Data Controller's registered office.

2. Types of Data Processed and Nature of Provision

The processing concerns your personal and identification data and/or those of the contact persons within your organization, provided for the pre-contractual and contractual purposes agreed with the Data Controller, payment data (e.g., IBAN), as well as images captured by the video surveillance system in case of access to the company premises.

Provision of such data is optional, but in some cases necessary (e.g., personal data and banking data) to achieve the purposes described above. Failure to provide such data may prevent Giacomini S.p.A. from executing the contract.

3. Purposes of Processing

Your data will be collected and processed for the following purposes:

- a) Responding to your information requests and fulfilling requirements necessary for execution of the contract
- b) Execution of the contractual services as detailed in the agreement signed between the Parties
- c) Fulfillment of administrative/accounting obligations and, in general, legal obligations; legal protection in case of contractual breach
- d) Judicial and extrajudicial debt collection
- e) Litigation/arbitration/mediation procedures
- f) Fulfillment of obligations required by law, regulations, EU legislation, or orders from Authorities
- g) Sending newsletters, product updates, and event communications.

4. Legal Basis for Processing

The legal basis for processing is the performance of the contract or pre-contractual measures (purposes a, b, c), compliance with legal obligations (purpose f), the pursuit of the Data Controller's legitimate interest (purposes d–e), and, regarding newsletters, product updates, and event communications, your explicit consent (purpose g).

The processing is therefore lawful pursuant to Article 6(1) of EU Regulation 2016/679.

5. Data Recipients

The Data Controller informs herewith that, wherever necessary for the purposes described above, your data may be disclosed, in addition to employees specifically authorized based on their duties, to the following external parties, appointed in writing as data processors where required:

- Accounting/tax consultancy firms
- Banks for payment management
- Public Administration for legally required communications

- Travel agencies or hotels in case of visits to the facility
- Service companies (including IT services) entrusted with specific tasks related to contractual obligations and newsletter distribution
- Professionals for debt collection or legal protection

The Data Controller will keep the list of external processors updated and will provide it upon specific request.

6. Processing Methods

Personal data is processed with digital instruments and paper-based supports, subject to specific security measures adopted, applied, and documented as required by the law in force. The personnel authorized to process data are appointed in writing by the Data Controller and receive specific training on applicable regulations. External parties entrusted with personal data processing, or parts of it, are designated as external processors pursuant to Article 28 of the GDPR and are therefore bound to comply with the technical and organizational measures required by the GDPR.

7. Data Transfer

Your data will be processed exclusively in Italy and, in any case, within the European Union. Should your data be transferred outside the European Union for any reason related to execution of the contract, the Data Controller shall ensure that the transfer will occur with appropriate safeguards or under the conditions set out by Article 49 of the GDPR.

8. Data Retention Period

Giacomini S.p.A. will retain your data as long as necessary to fulfill the purposes for which they were collected and subsequently processed, as well as for the period required by the laws in force for tax or other legal obligations. The retention period shall in any case not exceed 10 years, except for video surveillance data, which will be retained for no more than 72 hours. For the purposes referred to at point 3, letter g), your data will be retained for 10 years from the date of your last purchase, unless consent is withdrawn earlier.

9. Data Subject Rights

You may exercise, at any time, the rights provided under Articles 15 et seq. of EU Regulation 2016/679:

- a) Right of access to personal data
- b) Right to rectification or deletion of the data or restriction of processing
- c) Right to object to processing
- d) Right to data portability
- e) Right to withdraw consent, wherever applicable (withdrawal shall not affect the lawfulness of processing based on consent before withdrawal)
- f) Right to lodge a complaint with the supervisory authority (Italian Data Protection Authority)

The rights set out above may be exercised by sending an email to: privacy@giacomini.com, i.e. in writing to Giacomini S.p.A., Via per Alzo 39, 28017 San Maurizio D'Opaglio (NO).

Giacomini S.p.A.

Data Subject's Consent

The undersigned _____, born
in _____ on _____ (Tax ID code _____), resident/domiciled in
_____, _____ n.____, in his/her capacity of
_____, by acknowledging receipt of the information provided above in
compliance with Article 13 of EU Regulation 2016/679 and, by signing this, declares by signing this document:

to have read and understood in full this notice

to provide his/her consent for transmission of newsletters, product updates, and event notifications (as
per Article 3(g)).

Read and signed

_____, Li _____

Giacomini S.p.A.