CUSTOMER PRIVACY POLICY

Dear Customer,
Giacomini S.p.A., with registered office at Via per Alzo 39, (28017) San Maurizio D'Opaglio (NO), acting as the data controller, hereby provides you, pursuant to Regulation 2016/679/EU (General Data Protection Regulation—hereinafter "GDPR"), with this privacy notice regarding the processing of personal data collected in connection with the contract currently in effect between us. The processing will be carried out in compliance with the principles established by applicable law.

1. Data Controller, external data processors, and authorized persons

The Data Controller is GIACOMINI S.p.A., with registered office at Via per Alzo, 39, (28017) - San Maurizio D'Opaglio (NO), telephone: 0322/923111, e-mail address: info@giacomini.com.
The updated list of data processors and authorized persons is kept at the Data Controller's registered office.

2. Types of data processed

The processing involves personal and identifying data regarding you and/or contact persons within your organization that have been provided to us for pre-contractual and contractual obligations with the Data Controller, payment data (e.g., IBAN), as well as images captured by the video surveillance system when you access the workplace. In the case of tracking via pixels, the following data are also processed: opening or viewing of the e-mail; date and time of the interaction; number of times opened; message or pixel identifier; IP address, if collected by the server; device, operating system, browser, or e-mail client; any data related to clicks and interactions with the message; and any association of the event with the e-mail address or customer profile.

3. Purposes of data processing

The data will be collected and processed for the following purposes:
a) To respond to your requests for information and to fulfill the requirements necessary for entering into the contract
b) Performance of the contractual obligations detailed in the contract signed between the Parties
c) Performance of administrative and accounting obligations and, in general, legal obligations; legal protection in the event of breach of contract.
d) Judicial and extrajudicial debt collection;
e) litigation, arbitration, and mediation proceedings;
f) Compliance with obligations established by law, regulations, EU legislation, or an order from the Authority;
g) Sending newsletters, product updates, and event announcements;
h) analysis and improvement of the effectiveness of the Data Controller's marketing campaigns through tracking pixels embedded in the email—that is, through small, typically invisible graphic elements hosted on the Data Controller's own servers or those of designated service providers. Depending on the technical configuration used, these tools may allow us to detect whether the email has been opened or viewed, the date and time of the interaction, the number of times it was opened, the device or email client used, the IP address, and any interactions with the message's content. The data may be used to optimize the performance of marketing campaigns (for example: to improve their content and readability, adjust the frequency of mailings, and—where expressly indicated and authorized—personalize communications) or to verify whether the email has been opened for possible subsequent resending;
i) soft spam: sending commercial communications regarding products or services similar to those already contracted with the Data Controller.

4. Legal basis for processing and nature of data provision

The legal basis for processing is based on the performance of a contract or pre-contractual measures (purposes a, b, c)), on compliance with legal obligations (purpose f), on the pursuit of the data controller's

legitimate interests (purposes d–e), on the data subject's consent expressed below (purpose g), and on the express consent provided under Article 122 of Legislative Decree 196/2003 (Privacy Code) (purpose h).
With regard to soft spam, however, the legal basis for processing is Article 130, paragraph 4, of Legislative Decree 196/2003 (Privacy Code) (purpose i).
The processing is therefore lawful (Article 6, paragraph 1, of EU Regulation 2016/679).
At any time, you may revoke your consent by clicking the "unsubscribe" link or object to receiving commercial communications by clicking "unsubscribe" at the bottom of each email you receive.
Providing your data is necessary to achieve the purposes a–f listed above, and failure to provide such data could make it impossible for Giacomini S.p.A. to fulfill the contract.
Providing your data is, however, optional for purposes g–h–i.

5. Recipients of the data

The Data Controller informs you that, if necessary to achieve the purposes, your data may be disclosed—in addition to employees specifically authorized by virtue of their duties—to the following external parties, designated in writing and, where applicable, acting as data processors:

- an accounting firm for accounting and tax compliance;
- banks for payments;
- public administration for communications required by law;
- travel agencies or hotels in the event of visits to the facility;
- service providers (including IT service providers and software and application vendors) entrusted with specific tasks related to contractual obligations and the distribution of newsletters;
- professionals for debt collection or to protect the Data Controller.

The Data Controller will keep the list of external Data Processors up to date, and this list will be provided to the data subject upon specific request.

6. Methods of processing

Personal data is processed using electronic tools and paper-based media subject to specific security measures, which are adopted, applied, and documented as required by applicable law. Personnel authorized to process data are appointed in writing by the Data Controller and receive specific training regarding the applicable regulations. External parties entrusted with the processing of personal data, or parts thereof, are designated as external data processors pursuant to Article 28 of the GDPR and are therefore bound to apply the technical and organizational measures set forth in the GDPR.

7. Data Transfer

The data will be processed exclusively in Italy and, in any case, within the European Union. If, for reasons related to the performance of the contract, the data must be transferred outside the European Union, the data controller ensures that the transfer will take place in accordance with adequate safeguards or under the conditions set forth in Article 49 of the GDPR.

8. Retention periods

Giacomini S.p.A. retains your data for a period no longer than is necessary to achieve the purposes for which it is collected and subsequently processed, as well as for the period required by applicable regulations to fulfill tax obligations or other legal obligations. In any case, the maximum retention period is 10 years, except for data collected by the video surveillance system, which will be retained for no longer than 72 hours. For the purposes set forth in subparagraphs (g), (h), and (i) of point 3 above, the data will be retained for 10 years from the date of the last purchase, unless consent is revoked earlier.

9. Rights of the data subject

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

a) the right of access to personal data;

b) the right to obtain the rectification or erasure of such data or the restriction of processing;
c) the right to object to processing;
d) the right to data portability;
e) the right to withdraw consent, where applicable (withdrawal of consent does not affect the lawfulness of processing based on consent given prior to withdrawal);
f) the right to lodge a complaint with the supervisory authority (Data Protection Authority).

These rights may be exercised by sending an email to the following address: privacy@giacomini.com, or by writing to Giacomini S.p.A., Via per Alzo 39, (28017) San Maurizio D'Opaglio (NO).

Giacomini S.p.A.

Consent of the data subject

I, the undersigned _____, born in _____ on _____ (Tax ID _____), residing/domiciled in _____, Via_____ No._____, in my capacity as _____, having received the information set forth above in compliance with the provisions of Article 13 of EU Regulation 2016/679, hereby declare by signing this document:

[ ] that I have read and understood this privacy notice in its entirety

[ ] that I consent to the processing of my personal data for the purposes set forth in Article 3, letter g (sending newsletters, product updates, and event notifications).

[ ] to give consent to tracking via pixels for the purposes set forth in Article 3(h) (analysis and improvement of the effectiveness of the Data Controller's marketing campaigns through tracking pixels embedded in the email—that is, through small, typically invisible graphic elements hosted on the Data Controller's own servers or those of designated providers). Depending on the technical configuration used, these tools may allow the Data Controller to detect whether the email has been opened or viewed, the date and time of the interaction, the number of times it was opened, the device or email client used, the IP address, and any interactions with the message's content. The data may be used to optimize the performance of marketing campaigns or to verify whether the email was opened for possible subsequent resending.

Read and signed

_____, Li _____