



PRIVACY DISCLAIMER

[ART. 12, REG. (UE) 679/2106]

Dear Client,

we invite you to carefully read the contents of the present privacy disclaimer, prepared by Fadis S.p.A. with respect to the Regulation (EU) 2016/679.

At the end of the present document, you'll be asked to express your consent to certain specific processes regarding your data. It is specified whether your consent is needed in order to follow up our relationship.

Data process' terms and conditions by Fadis S.p.A. are moreover available at the following web address: www.fadis.it/privacy.html.

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CONTROLLER

FADIS S.P.A.
VAT 00216410126
Italy, 21048, Solbiate Arno (VA), Via Colombera n. 70
web: www.fadis.it
e.mail: privacy@fadis.it

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DATA PROCESSED

DATA PROVIDED

In order to purchase our products and/or obtain the services offered by Fadis S.p.A., we will ask you to submit some information.

In particular, you may be asked to provide the following information (the following list is not comprehensive, but is indicated merely as an example): your name, your contact information (such as address, telephone number, e.mail), nationality, tax number and VAT code (if applicable).

Granting such information is required by Fadis S.p.A. in order to sale its products and/or provide the services; the failure to communicate such data may determine the impossibility to access the services offered by Fadis S.p.A.

PARTICULAR CATEGORIES OF PERSONAL DATA

Fadis S.p.A. generally avoids to collect and process particular categories of personal data. Among those categories are included data that reveal your ethnic or racial origin, your political position, your religious or philosophical convictions, or your trade union affiliation or genetic data, biometric data aimed to identify uniquely a natural person, data on wealth or sexual life or sexual orientation of the person.

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LEGAL BASIS FOR THE PROCESSING

Whenever, in specific cases, Fadis S.p.A. should collect or anyway process particular categories of personal data (as an example: statements on medical status disclosed for tax purposes), in order to achieve the purposes mentioned below, we will always process such data in accordance with dispositions of law and with the requirements as indicated in the present privacy disclaimer.

Fadis S.p.A. will process your data pursuant to Articles 6 and 9 of the Regulation (EU) 679/2016 and on the basis of the consent under Article 7:

- a. **CONSENT** - [art. 6, (1)(a), art. 7, and, if applicable, art. 9, (2)(a)] - Fadis S.p.A. will process certain data solely upon your prior, free and express consent. You'll have the faculty to withdraw your consent at any time with effect for the future.
- b. **PERFORMANCE OF A CONTRACT OR OF PRE-CONTRACTUAL MEASURES** - [art. 6, (1) (b)] - in order to undersign and give execution to the agreement with Fadis S.p.A., we need to have access to certain data.
- c. **PROTECTION OF LEGITIMATE INTERESTS PURSUED** - [art. 6, (1)(f)] - Fadis S.p.A. will process certain data in order to protect its interests or third parties interests. Such principle, however, shall be applied except where such interests are overridden by your interests.

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PURPOSES OF DATA PROCESSING

Fadis S.p.A. will process your data only for the purposes permitted by the law.

This regards the following purposes: **(i)** purposes prior approved by you; **(ii)** data processing in order to conclude the agreement and provide the requested products and services; **(iii)** fulfillment of legal duties to which we are subject (included requirements set forth by the relevant Authorities); **(iv)** protection of our legitimate interests or of third parties legitimate interests, except where such interests are overridden by your interests; **(v)** exercise of our rights and fulfillment of our duties under social safety and protection laws; **(vi)** establishment, exercise or defence of a legal right or claim; **(vii)** for relevant public interest reasons.

Among the others, we will process your data for specific purposes as listed below. Please take note that this is not a comprehensive list of any single purpose, but merely an exemplification aimed to explain the aforementioned purposes.

4.1 PURPOSES OF PROCESSING RELATED TO AGREEMENT CONCLUDED WITH FADIS S.P.A. AND THE SERVICES AND PRODUCTS REQUESTED.

- a. **MAIN PURPOSE.** The main purpose of processing your data regards the issuing of invoices for the services provided by Fadis S.p.A. in your favour and sending information notices.
- b. **CONTACT.** In such context, there could be the opportunity or necessity for Fadis S.p.A. to contact you in relations to the agreement concluded and to the products and services requested. This why we need your personal data.

4.2 PURPOSES OF PROCESSING IN ORDER TO RESPECT LEGAL REQUIREMENTS.

Fadis S.p.A. is subject to several legal requirements. If necessary, your data will be processed to guarantee the compliance with those requirements.

- a. **DATA SAFETY.** Data safety represents a relevant legal requirement. If

necessary, we will process also your data in the context of the essential measures to evaluate and guarantee data safety.

- b. **INTERNAL COMPLIANCE MANAGEMENT.** Within the context of compliance management (intended as the respect of any rule and disposition of law) we will evaluate - for example - if you had received appropriate advices when you requested the services and if our personnel had behaved properly and accordingly to law requirements.
- c. **LEGAL REQUIREMENTS.** Fadis S.p.A. is subject to several legal requirements. We will process your data as needed to the extent to be respectful of such requirements and we could forward your data to the competent Authorities, if set forth by communication law requirements. We could also process your data in case of law suit, if required.

4.3 PURPOSES OF PROCESSING UNDER CONSENT.

In certain cases, we process your data only if you granted your consent at this extent.

- a. **ADVERTISING AND MARKETING.** Only if you granted your consent at this extent, we will process your data to inform you of any offer that may interest you and we will contact you using the communication channels that you have authorized. The mentioned advertising and marketing activities should be performed by way of traditional contact method (like call by operator, letters, advertising material sent by mail) or by way of automated methods (like automated system of calling, calls without operator, e.mail, telefax, MMS or SMS messages). It is possible at any time to object the processing for these purposes.

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STORAGE PERIOD OF YOUR DATA

Fadis S.p.A. - Pursuant to art. 5, co. 1, lett. e) of Regulation (EU) 679/2016 - will store your data only for the period of time needed to processing the data for purposes for which they are processed.

In the event that the data are processed for different purposes, the same data will be automatically erased or saved in a format that doesn't allow to reach a straight conclusion on your identity, as soon as the last specific purpose will be complied.

For a correct data erasing under Regulation (EU) 679/2016, Fadis S.p.A. implements a storage policy of your data in accordance with what provided for the storage requirements of documents for fiscal purposes and with respect to the general rules on limitation period of the contractual claims. Therefore, Fadis S.p.A. will delete data provided upon expiry of a ten years period as sets forth by the law.

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DATA SHARING

Your data won't be shared with any subject other than Fadis S.p.A.

Your persona data - in general - will remain under Fadis S.p.A.

In certain cases, Fadis S.p.A. could communicate your data to the Authorities in order to fulfil legal requirements.

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DATA SUBJECT RIGHTS

In your quality of data subject, you shall exercise certain rights toward us as provided by Regulation EU 679/2016 and other applicable rules concerning data protection.

The present § 7 contains clarification regarding your rights as data subject under Regulation EU 679/2016.

In particular:

7.1 DATA SUBJECT RIGHTS.

In your quality of data subject, you have the following right toward Fadis S.p.A.:

- a. **RIGHT OF ACCESS.** At any time you can ask to have information about your data as stored by us. Such information regards, among the others, the categories of data processed, the purposes of processing, the origin of the data in case we didn't obtain such data directly from you, as well as the recipients to who we may have transferred your data, if applicable. You could obtain a free copy of your data. If you wish to have further copies, Fadis S.p.A. reserves the right to ask a remuneration for them.
- b. **RIGHT OF RECTIFICATION.** At any time you can ask a rectification of your data. As a consequence, Fadis S.p.A. will adopt appropriate actions to make your data - as stored and processed by us on an ongoing basis - to be kept correct, complete, updated and pertinent, on the basis of the most updated data granted.
- c. **RIGHT TO ERASURE.** At any time you can ask the erasure of your data, subject to conditions as provided by the law. For example, that could happen as set forth in Article 17 of Regulation EU n. 679/2016:
 - if your data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - if you withdraw consent on which the processing is based and there is no other legal ground for the processing;
 - if you object to the processing and there are no overriding legitimate grounds for the processing;
 - if your personal data have been unlawfully processed, unless the processing is necessary: (i) for the fulfillment of a legal requirement that pretends the processing of your data; in particular for what it regards the period of storage of the documents as set forth by the law; (ii) for the establishment, exercise or the defence of a legal right or claim.
- d. **RIGHT TO RESTRICTION OF PROCESSING.** At any time you can obtain a restriction of processing your data if:
 - you contest the accuracy of the personal data, for a period enabling us to verify the accuracy of the personal data;
 - the processing is unlawful and you oppose to the erasure of the personal data and request the restriction of their use instead;
 - we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
 - you have objected to processing pending the verification whether the legitimate grounds of the controller override those of the data

subject.

- e. **RIGHT TO DATA PORTABILITY**. At any time you have the right to receive a copy of your data as they have been prior provided directly to Fadis S.p.A. on your explicit request, we will transfer your data - if it is technically workable - to another controller.
- f. **RIGHT TO OBJECT**. At any time you can object, on grounds relating to your particular situation, to the processing of your data pursuant to point e) or f) of Article 6, (1) of Regulation EU n. 679/2016, or whenever personal data are processed for direct marketing purposes. In such case, we will no longer process your data. This last condition is not applicable if we can demonstrate that compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- g. **RIGHT TO OBTAIN A COPY OF THE SAFEGUARDS**. At any time you can obtain a copy of the appropriate safeguards implemented for what it regards the data transfer toward third countries, if applicable.
- h. **RIGHT TO WITHDRAW THE CONSENT AT ANY TIME**. At any time you can withdraw the consent, if the processing is based on your consent, without prejudice to lawfulness of the processing based on the consent granted prior to the withdrawal, by sending a request to the address afore indicated (see § 1) or otherwise with technical procedures made available by Fadis S.p.A. for the relevant processing.

7.2 TERMS OF FULFILMENT.

Fadis S.p.A. always tries its best to manage the request within a 30 (thirty) days period. Nevertheless, such period could be extended for reasons related to the specific right of the data subject or to the complexity of his request.

7.3 RESTRICTION RELATING TO THE COMMUNICATION OF INFORMATION PENDING THE FULFILLING OF REQUIREMENTS PERTAINING RIGHTS OF THE DATA SUBJECTS.

In certain situations, we may not be able to provide you with the information about your data due to legal provisions. In case we shall be obliged to decline your request of information, we will explain the reasons for our denial.

7.4 CLAIMS TO AUTHORITY.

In case you won't consider exhaustive the feedback provided by Fadis S.p.A. to your requests and/or notifications, you have the right to notify a claim to the competent data protection authority, pursuant to Article 77 of Regulation EU n. 679/2016.

Please find below the contact info of the competent data protection authority:

➤ **AUTHORITY FOR DATA PROTECTION.**

Piazza di Monte Citorio n. 121 00186 ROME (ITALY)
Fax: (+39) 06.69677.3785
Phone: (+39) 06.696771
e.mail: garante@gpdp.it
<http://www.garanteprivacy.it>

LEGISLATION
REFERENCE

ITA: <http://eur-lex.europa.eu/legal-content/IT/TXT/?uri=CELEX%3A32016R0679>

ENG: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679>

The further national legislation concerning data protection can be found on the official web site of the Authority at the following web address:

www.garanteprivacy.it

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MODIFIES TO THE
PRESENT DISCLAIMER

We will inform you about any significant modifies concerning the way your data are processed.

EXPRESSION OF CONSENT TO DATA PROCESSING

The undersigned,

NAME _____

SURNAME _____

FISCAL CODE _____

as the representative of the Company

DENOMINATION _____

VAT NUMBER _____

declares that he/she has been duly informed on what above and to have understood which are his/her rights as provided by the current *privacy* legislation, and

EXPRESS THE CONSENT AS FOLLOWS, BY CROSSING THE RELEVANT CHECKBOX

- ★ to processing of data in order to conclude the contract with Fadis S.p.A. for the supplying of products and services

YES, GIVES CONSENT | NO, REFUSES CONSENT

[WARNING: consent refusal makes impossible the performance]

- ★ to processing of data in order to supply products and provide services by Fadis S.p.A.

YES, GIVES CONSENT | NO, REFUSES CONSENT

[WARNING: consent refusal makes impossible the performance]

- ★ to processing of data to the extent of advertising and marketing activities, by sending publicity material (paper copy and telematic) concerning social and institutional activities, possibly also with automated processing (like automated call or communication system or call without an operator, e.mail, MMS or SMS messages)

YES, GIVES CONSENT | NO, REFUSES CONSENT

PLACE

DATE

SIGNATURE