

## Information provided pursuant to Articles 12 et seq. of Regulation (EU) 2016/679 on the protection of personal data (GDPR)

Foreword - The GDPR provides for the protection of persons and other subjects with regard to the processing of personal data. According to this legislation, the processing of personal data referring to a person, specifically to be defined as 'data subject', shall be based on the principles of fairness, lawfulness and transparency, as well as protection of the confidentiality and rights of the data subject.

**Processing of data relating to legal persons does not fall within the scope of the data protection rules laid down in the Regulation. For the purposes of clarity and transparency towards its Customers and Suppliers, CIRCULAR MATERIALS S.r.l. also provides this information to legal persons, describing the methods and purposes of all processing that the Company performs or is entitled to perform on personal data.**

According to the GDPR and Italian legislation, since such data constitutes information that refers to You, it must be qualified as "personal data" and must therefore benefit from the protection provided by said legislation. Specifically, according to said legislation, You are the data subject who benefits from the rights established to protect Your personal data.

### 1. Data Controller

The company CIRCULAR MATERIALS S.r.l. with registered office in Viale delle Industrie n. 20, Cambiago (MI) CF P.IVA 10805160966, e-mail: [privacy@circularmaterials.it](mailto:privacy@circularmaterials.it) hereby informs you, pursuant to Art. 13 of EU Regulation 2016/679 (hereinafter referred to as the 'Regulation' or 'Applicable Legislation'), that CIRCULAR MATERIALS is the DATA CONTROLLER of the PERSONAL DATA that you will provide and that it will process the data for the purposes and in the manner set out below.

At any time, you may contact the 'Data Controller' for information and/or to report any problems.

### 2. Purpose of Processing, Legal Basis and Data Retention Period

Purpose	Type of Data	Legal Basis	Retention Period
<b>1. Pre-contractual/contractual</b> Provide information about marketed products and services, if requested by the data subject; execution of existing contractual relationships.	Personal data and contact details; data necessary for the execution of the contractual relationship	Performance of a contract to which you are a party or pre-contractual measures taken at the request of the data subject; fulfilment of legal obligations. art. 6 co. 1 lett. b) e c) GDPR.	According to the legal regulations.



<u>2. Request management.</u>	Personal data, contact details, personal data depending on the contracted product/service.	Performance of a contract to which you are a party (for troubleshooting and malfunctions). Legitimate interest (for analysis aimed at improving the service).	Ten years since the conclusion of the contract
<u>3. establishing, exercising or defending legal claims</u>	Master data and contact details, data relating to the performance of the contract.	Legitimate interest (legal protection) Art. 6 co 1 light. f) GDPR.	For the time necessary to exercise rights in court.
<u>4. Fulfilment of legal obligations</u>	Personal data and contact details; data necessary for the execution of the report contrattuale	Legal obligation to which the Data Controller is subject	10 years from the conclusion of the contract

### 3. Obligatory Nature of Providing Data

The data subject must provide the Companies with the data necessary for the performance of the contractual relationship, as well as the data necessary to fulfil the obligations provided for by laws, regulations, community rules, or by provisions of Authorities legitimated to do so by law and by supervisory and control bodies.

### 4. Data Processing Methods

Pursuant to and for the purposes of Articles 12 et seq. of the Regulation, we wish to inform you that the personal data you communicate to us will be recorded, processed and stored in our archives, on paper and electronically, in compliance with the appropriate technical and organisational measures referred to in Article 32 of the Regulation. The processing of your personal data may consist of any operation or set of operations among those indicated in Article 4, paragraph 1, point 2 of the Regulation.

Personal data shall be processed using instruments and procedures suitable to guarantee their security and confidentiality and may be carried out, directly and/or through delegated third parties, either manually by means of paper supports, or with the aid of computerised or electronic means. For the purposes of the proper management of the relationship and the fulfilment of legal obligations, the data may be included in the Controller's own internal documentation and, if necessary, in the records and registers required by law. The data will not be subject to profiling.

### 5. Recipients of Personal Data

The personal data of the data subject may be communicated to and processed by external parties



operating as autonomous data controllers pursuant to Articles 4 and 24 GDPR, such as, by way of example, authorities and supervisory and control bodies and, in general, public or private parties entitled to request the data and/or parties operating as data processors pursuant to Article 28 GDPR), such as, by way of example, consulting companies and/or professional firms and/or professionals, for example legal, tax and insurance companies.

The data may also be communicated by the Companies to their business partners/dealers for the performance of activities related to the execution of the contract or for the performance - by the same - of commercial actions, subject to the express consent of the data subject.

## 6. Data Transfer to Countries Outside the EU

The data provided by the data subject will only be processed in countries within the European Union. Should the personal data of the data subject be processed in a country outside the EU, the rights attributed to the latter by EU law will be guaranteed and the data subject will be promptly notified.

## 7. Rights of the Data Subject

Pursuant to Articles 15 et seq. of the GDPR, the data subject may exercise the following rights:

1. Access: confirmation or otherwise that the personal data of the data subject is being processed and the right to access the same; requests that are manifestly unfounded, excessive or repetitive cannot be answered;
2. Rectification: to correct/obtain the correction of personal data if incorrect or obsolete and to complete personal data if incomplete
3. Deletion/oblivion: to obtain, in some cases, the deletion of the personal data provided; this is not an absolute right, as the Companies may have legitimate or legal reasons for retaining them
4. Limitation: the data will be archived, but may not be processed or further processed, in the cases provided for by the legislation;
5. Portability: moving, copying or transferring data from the Companies' databases to third parties. This applies only to data provided by the data subject for the performance of a contract or for which express consent has been given and processing is carried out by automated means;
6. Objection to direct marketing;
7. Withdrawal of consent at any time, if the processing is based on consent.

Pursuant to Art. 2-undicies of Legislative Decree. 196/2003, the exercise of the rights of the data subject may be delayed, restricted or excluded, by reasoned notice given without delay, unless such notice is likely to jeopardise the purpose of the restriction, for such time and to the extent that this constitutes a necessary and proportionate measure, having regard to the fundamental rights and legitimate interests of the data subject, in order to safeguard the interests referred to in subsection 1(a) (protected money laundering interests), (e) (the conduct of defensive investigations or the exercise of a right in court) and (f) (the confidentiality of the identity of the employee who reports offences of which he has become aware by reason of his office). In such cases, the rights of the person concerned may also be exercised through the Garante in the manner set out in Article 160 of the same Decree. In such cases, the Garante will inform the data



subject that it has carried out all the necessary verifications or that it has conducted a review, as well as of the data subject's right to lodge a judicial appeal.

CIRCULAR MATERIALS S.r.l.