



**CIRCULAR
MATERIALS**

Information pursuant to Art. 13 of EU Regulation 2016/679

CIRCULAR MATERIALS S.r.l., located at Viale delle Industrie no. 20 Cambiago (MI), Tax Code and VAT number 10805160966, whose contact details are email: privacy@circularmaterials.it (hereinafter referred to as CIRCULAR MATERIALS for brevity), recognizes the importance of protecting personal data and considers its protection one of the main goals of its business.

Before providing any personal data, CIRCULAR MATERIALS invites you to carefully read this privacy policy ("Privacy Policy") as it contains important information about the protection of personal data and the security measures adopted to ensure its confidentiality, in full compliance with the applicable regulations.

Please note that this Privacy Policy is provided exclusively for the website www.circularmaterials.it ("Site") and does not apply to other websites that may be accessed through external links. It should be regarded as an information notice rendered pursuant to Art. 13 of EU Regulation 2016/679 to those who access and interact with the Site.

Furthermore, CIRCULAR MATERIALS has decided to comply with the recommendations outlined in Recommendation no. 2/2001 on the minimum requirements for the online collection of data in the European Union, adopted on May 17, 2001, by the Article 29 Working Party.

CIRCULAR MATERIALS informs you that the processing of your personal data will be conducted in accordance with the principles of lawfulness, fairness, transparency, purpose and storage limitation, data minimization, accuracy, integrity, and confidentiality. Therefore, your personal data will be processed in accordance with legislative provisions and confidentiality obligations provided therein.

Data Controller

Through this notice, CIRCULAR MATERIALS S.r.l., located at Viale delle Industrie no. 20 Cambiago (MI), Tax Code and VAT number 10805160966, whose contact details are email: privacy@circularmaterials.it, 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 provided and will process it for the purposes and in the manner specified below.

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

Personal Data Subject to Processing

"Personal Data" refers to any information relating to an identified or identifiable natural person, with

particular reference to identifiers such as a name, identification number, location data, an online identifier, or one or more elements characteristic of their physical, physiological, mental, economic, cultural, or social identity.

In line with the above, CIRCULAR MATERIALS may collect the following data through the Site:

Browsing Data

The Site's computer systems collect some Personal Data, the transmission of which is implicit in the use of internet communication protocols. This information is not collected to be associated with specific users, but by its nature could, through processing and associations with data held by third parties, allow for user identification. These include IP addresses or domain names of devices used to connect to the Site, URIs (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numeric code indicating the status of the server's response (success, error, etc.), and other parameters related to your operating system and IT environment.

This data is used to gather anonymous statistical information about the use of the Site and to ensure its proper functioning; to allow the correct provision of the various functionalities requested by you, for security reasons, and to ascertain responsibility in case of hypothetical cybercrimes against the Site or third parties. The data is deleted after 7 days.

Data voluntarily provided

Through the Site, you may voluntarily provide Personal Data, such as your name and email address, to contact CIRCULAR MATERIALS via the "Contact Us" form. CIRCULAR MATERIALS will process this data in compliance with sector regulations, assuming that the data is related to you or to third parties who have expressly authorized you to provide it based on a suitable legal basis that legitimizes its processing.

In such cases, you are considered an independent data controller, taking on all legal obligations and responsibilities. In this sense, you release CIRCULAR MATERIALS from any claims or requests for compensation for damage resulting from the processing of Personal Data of third parties that were processed via your use of the Site in violation of applicable regulations.

Cookies and similar technologies

CIRCULAR MATERIALS collects Personal Data through cookies. More information on the use of cookies and similar technologies is available in the specific policy to which you are referred.

Purposes, Legal Basis, and Optional or Mandatory Nature of the Processing

The Personal Data you provide through the Site will be processed by CIRCULAR MATERIALS for

the following purposes:

- purposes related to the performance of a contract you are a part of or to pre-contractual measures adopted upon your request (e.g., contact request via the Contact Form, job application);
- purposes of research/statistical analysis on aggregated or anonymous data, which do not allow the identification of the user, aimed at measuring the functioning of the Site, measuring traffic, and evaluating usability and interest;
- purposes related to compliance with a legal obligation to which CIRCULAR MATERIALS is subject;
- purposes necessary to establish, exercise, or defend a legal right in court or whenever judicial authorities exercise their judicial functions.

The legal basis for the processing of Personal Data for the purposes mentioned in point a) is the provision of a service or the response to a request, which does not require consent under EU Regulation 2016/679. The purpose mentioned in point b) does not involve the processing of Personal Data, while the purposes mentioned in points c) and d) represent legitimate processing of Personal Data under Regulation 2016/679, as the processing is necessary to fulfill a legal obligation to which CIRCULAR MATERIALS is subject or to exercise its right of defense in court. Providing your Personal Data for the purposes listed above is optional, but failure to do so may make it impossible to respond to your request or to fulfill a legal obligation that CIRCULAR MATERIALS may be subject to.

Recipients

Your Personal Data may be shared for the purposes specified with:

- entities necessary for the provision of services offered by the Site, such as those responsible for analyzing the Site's functioning, acting typically as data processors for CIRCULAR MATERIALS;
- individuals authorized by CIRCULAR MATERIALS to process Personal Data, who are committed to confidentiality or have an adequate legal confidentiality obligation (e.g., employees and collaborators of CIRCULAR MATERIALS);
- judicial authorities in the exercise of their functions when required by applicable regulations.

Transfers

Some of your Personal Data may be transferred to recipients located outside the European Economic Area. CIRCULAR MATERIALS ensures that the electronic and paper-based processing of your Personal Data by such recipients complies with the applicable regulations.



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Data Retention

CIRCULAR MATERIALS will process your Personal Data for the time strictly necessary to achieve the purposes mentioned above. For example, CIRCULAR MATERIALS will process your Personal Data for the time permitted by Italian law to protect its interests (Articles 2946 and 2947 of the Civil Code). In any case, the data collected through the "Work with Us" area will be retained for no longer than 24 months from the time of collection.

Your Rights

Within the limits of applicable law, you have the right to request at any time from CIRCULAR MATERIALS access to your Personal Data, its rectification or deletion, or to object to its processing, request the restriction of its processing, as well as obtain the data concerning you in a structured, commonly used, and machine-readable format.

Requests should be sent via email to: privacy@circularmaterials.it

Under the applicable legislation, you also have the right to lodge a complaint with the competent supervisory authority (Data Protection Authority) if you believe that the processing of your Personal Data is contrary to current regulations.

CIRCULAR MATERIALS S.r.l