

PRIVACY POLICY FOR RELATIONSHIPS ESTABLISHED WITH CUSTOMERS AND SUPPLIERS

Information provided pursuant to Article 13 of the EU Reg. 2016/679 (hereafter GDPR)

Raccortubi Group considers the protection of natural persons, with regard to the processing of personal data, a fundamental right. Transparency towards the interested parties is therefore a primary objective, pursued through effective communication tools aimed at making the basic information on the processing of their data available to interlocutors. The interested parties are informed of the following general profiles, valid for all areas of processing:

- all the data of the subjects with whom we interface are processed in a lawful, correct and transparent manner, in compliance with the general principles established by Art. 5 of the GDPR;
- specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access, pursuant to Article 32 of the GDPR.

Object of processing The Organization processes personal data identifying customers / suppliers (for example, name, surname, company name, personal / fiscal data, address, telephone, e-mail, bank and payment details) and their operational contacts (name surname and contact details) acquired and used as part of the provision of the products / services supplied.

Purpose and legal basis of processing Data are processed to:

- conclude contractual / professional relationships;
- fulfill the pre-contractual, contractual and tax obligations deriving from existing relationships, as well as manage the necessary communications connected to them;
- fulfill the obligations established by law, by a regulation, by community legislation or by an order of the Authority
- exercise a legitimate interest as well as a right of the Holder (for example: the right of defense in court, the protection of credit positions, the ordinary internal needs of an operational, managerial and accounting nature).

Failure to provide the aforementioned data will make it impossible to establish the relationship with the Holder. The aforementioned purposes represent, pursuant to Article 6, commi b, c, f, suitable legal bases for the lawfulness of the processing. If it is intended to carry out processing for different purposes, a specific consent will be required from the interested parties.

Processing methods The processing of personal data is carried out by means of the operations indicated in Art. 4 n. 2) GDPR and more precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Personal data are subjected to both paper and electronic and / or automated processing. The Data Controller will process personal data for the time necessary to fulfill the purposes for which it was collected and related legal obligations.

Scope of processing The data are processed by internal subjects regularly authorized and instructed pursuant to Article 29 of the GDPR. It is also possible to request the scope of communication of personal data, obtaining precise indications on any external subjects acting as managers or independent data controllers (consultants, technicians, banks, transporters, etc.).

References of Data Controller and Data Protection Officer The Data Controller is the Group company with which the interested party has established the contractual relationship, which can be contacted at the following addresses:

Raccortubi Spa - Viale De Gasperi, 194 - 20010 Marcallo with Casone (MI) - +39.02.9763001 - venditeita@raccortubi.com

Petrol Raccord Spa - Via Trebbia, 29 - 29010 Calendasco (PC) - +39.0523.761811 - petrolraccord@petrolraccord.com

Tecninox Srl - Via Don Spagnoli, 7 - 29010 Sarmato (PC) - +39.0523.887452 - venditeita@raccortubi.com

The Group has appointed a Data Protection Officer, which can be contacted for any information regarding privacy or to exercise the rights listed below (DPO Contacts: Dr. Gregorio Galli - Strada della Viggiolotta, 08 - 29121 Piacenza; Tel: 0523.1865049 - Email: dpo@gallidataservice.com)

Rights of the interested parties

- right to request the presence and access to personal data concerning him / her (Art.15 "Right of access")
- right to obtain the correction / integration of inaccurate or incomplete data (Art.16 "Right of rectification")
- right to obtain, if there are justified reasons, the cancellation of data (Art.17 "Right to cancel")
- right to obtain the treatment limitation (Art.18 "Right to limitation")
- right to receive data concerning him in a structured format (Art.20 "Right to portability")



- right to oppose the processing and automated decision-making processes, including profiling (Art.21, 22)
- right to revoke a previously granted consent;
- right to present, in case of non-response, a complaint to the Data Protection Authority.