# PRIVACY POLICY IN ACCORDANCE WITH ARTICLE 13 OF REGULATION (EU) NO. 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

We inform you herewith that Regulation (EU) No. 2016/679 provides for the protection of natural persons and other subjects with regard to the processing of personal data. Under the abovementioned legislation, the processing of your personal data will be based on the principles of fairness, lawfulness and transparency and on protecting your privacy and your rights.

Under applicable law, we hereby provide the following information:

### 1. Purposes and methods of processing data

The personal data you have provided us with shall be processed exclusively for the purposes strictly connected and instrumental to the fulfilment of the obligations relating to the arrangements with the undersigned Data Controller, more specifically:

- 1.1. information provided via email submissions or online form completions;
- 1.2. to send advertising material or direct selling materials, or to conduct market research or for commercial communication (by fax, phone, e-mail, SMS and WhatsApp). It involves targeted marketing activities conducted through the analysis (without the aid of automated decision-making processes) of the data processed.

The Data Controller, the data processor(s) and the person(s) in charge of the processing and/or authorised third parties will process the personal data on hard copies and using electronic storage devices in compliance with all precautionary measures, which guarantee their security and confidentiality and with due regard for the appropriate technical and organisational measures to ensure a level of security appropriate to the risk of the processing operations.

#### 2. Nature of the data collection and consequences of any failure to provide them

The provision of your personal data, except for the purposes of paragraph 1.2, is mandatory to fulfil the obligations arising from your request.

Failure to provide personal data may make it impossible for us to proceed with your request.

#### 3. Communication and disclosure of personal data

For the purposes of performing the agreement and for the abovementioned reasons, your personal data may be disclosed to:

- all natural and legal persons (legal, administrative and fiscal consulting firms, accounting firms, couriers and shippers, data processing centres, etc., marketing and web-marketing companies), in cases where communication is necessary for the abovementioned purposes;
- our internal and external collaborators and specifically-tasked employees and, in the context of their duties, specifically appointed as persons tasked with processing or data processors.

# 4. Rights of the data subject.

You may exercise your rights at any time vis-à-vis the data controller under Article 15 of Regulation (EU) No. 2016/679, which we summarise below:

- 1. The data subject shall have the right to obtain confirmation as to whether or not personal data concerning him or her exist, and, where that is the case, communication of the same in an intelligible form.
- 2. The data subject has the right to obtain information on:
  - the origin of the personal data;
  - the purposes and methods of processing;
  - the logic applied to data processed by electronic means;
  - the personal identification details of the data controller and any data processors;
  - the subjects or categories of subjects to whom the personal data may be communicated or who may become aware thereof as the appointed representative in Italy or outside of Italy, as data processors or as persons tasked with processing.
- 3. The data subject has the right:
  - to obtain the updating, the rectification of inaccurate personal data concerning him or her or, when interested, to have incomplete personal data completed;
  - to obtain the cancellation, the conversion into anonymous form or to block data processed in violation of the law, including data that do not need to be stored for the purposes for which they were collected and subsequently processed;
  - to obtain proof that the processing operations referred to in Clause 3) were brought to the attention, also in terms of their contents, to those to whom the data were communicated or disclosed, except in the event where this performance becomes impossible or involves the use of means manifestly disproportionate to the protected right.
- 4. The data subject has the right to object, wholly or partly:
  - for legitimate reasons, to the processing of personal data, even if pertinent for collection purposes, without prejudice to the cases laid down in Article 2, paragraph 2 of the abovementioned Regulation;
  - to the processing of their personal data for the purpose of sending advertising or direct selling materials or to conduct market research or for business communications (see paragraph 1.2 above).

The above rights are exercised by making an informal request to the Data Controller, including through a person tasked with processing, to whom an adequate reply shall be provided without delay.

The request may also be sent to the Data Controller by registered letter, fax or e-mail.

The data subject has the right to file a complaint with the Italian Data Protection Authority.

### 5. Termination of the appointment

• In the event where the processing is discontinued for any reason, under Article 17 of Regulation (EU) No. 2016/679, your data will be

a) erased, once the storage obligations imposed by Article 2220 of the Italian Civil Code, by Articles 19 and 22 of Presidential Decree No. 600/1973 or by another specific legislation have expired; b) transferred to another data controller, as long as they are processed in a manner compatible with the purposes for which the data were collected; c) stored for exclusively personal purposes and not intended for systematic communication or disclosure; d) stored or transferred to another data controller, for archival and statistical purposes, in accordance with the law, with regulations, with European Community legislation and with codes of ethics and good conduct endorsed in accordance with Article 40 of Regulation (EU) No. 2016/679.

# 6. Data controller and contact information for the DPO.

The data controller is: EST CHEMIE S.r.l., con sede in Via Gramsci n. 31, Bernareggio (MB), C.F. 11490460968 The DPO has not been appointed. We ask that you provide your consent to the processing of your personal data herein below.

# Acknowledgement of receipt and Consent of the Data Subject

I, the undersigned data subject, having duly acquired the information provided by the Data Controller in accordance with current legislation:

I acknowledge that I have read the conditions to the processing and disclosure of personal data for the purposes and to the subjects indicated in the abovementioned statement, with the caveat that failure to do so will result in the non-performance of the service.

AND

I give my consent to the disclosure of personal data, also to advertise the services offered by the Data Controller referred to in paragraph 1.2, for the purposes of and within the scope indicated in the privacy policy (optional)

\_\_\_ I consent \_\_\_ I do not consent