



## INFORMATION pursuant to article 13 of EU Regulation 2016/679

**SIMEM SPA** ( hereinafter, the “ **Data Controller** ”), as Data Controller, pursuant to art. 13 of EU Regulation 2016/679 (hereinafter, the " **Privacy Regulation** "), and subsequent amendments and additions, collects and subsequently processes personal data relating to its Customers and Suppliers (hereinafter, the " **Interested Party** ").

### 1. Types of data being processed

The personal data processed consists of:

Common personal data. This information includes, by way of example and not limited to, personal details and contact details (email address and telephone number).

### 2. Purpose and methods of processing.

The personal data of the interested party are processed as part of the normal activity of the Data Controller, for the pursuit of the following purposes:

1. correct and complete execution of the obligations of the contractual relationship established (hereinafter, the " **Contract** ");
2. administrative and accounting obligations strictly connected to the Contract;
3. fulfillment of specific obligations established by law, a regulation or community legislation;
4. promotional activity including the sending of newsletters, regarding products and services similar to those already purchased

The processing of personal data takes place, under the authority of the Data Controller, by subjects specifically appointed, authorized and trained in processing pursuant to art. 29 of the Privacy Regulation, using manual, IT or telematic tools, with logic strictly related to the purposes and in any case in such a way as to guarantee the confidentiality and security of personal data. The processing of personal data may also take place, on behalf of the Data Controller, by data processors specifically designated pursuant to art. 28 of the Privacy Regulation.

### 3. Legal basis of the processing and nature of the provision.

With reference to the purposes referred to in the previous paragraph 2, points 1,2,3, the provision of personal data is mandatory and constitutes a necessary requirement for the execution of the Contract and the related fiscal and administrative obligations. Failure to provide the data determines the impossibility of receiving the service covered by the Contract itself. The legal basis of the related processing is the correct execution and management of the Contract.

With reference to point 4) - activity towards acquired customers -, the legal basis is the legitimate interest of the owner. The customer may stop receiving these email communications at any time.

#### **4. Subjects or categories of subjects to whom personal data may be communicated and scope of communication.**

In relation to the purposes of the processing indicated above and within the limits strictly relevant to the same, the personal data of the interested party will or may be communicated to the following categories of subjects:

- 1) Financial administration and other public authorities, where required by law or at their request;
- 2) Credit institutions for payment orders or other financial activities instrumental to the execution of the Contract;
- 3) external parties who carry out control activities, such as auditing firms, board of auditors, supervisory bodies;
- 4) companies and organizations for credit management and/or for the protection of interests and rights;
- 5) subjects designated as external data controllers pursuant to art. 28 of the Privacy Regulation, for activities connected, instrumental or consequent to the execution of the Contract

The updated list of subjects appointed as external managers can be provided by the Data Controller upon request by the interested party.

#### **5. Extra-EU data transfer**

Personal data will not be transferred to non-EU countries; where for subsequent reasons connected to the execution of the contract, or the fulfillment of legal obligations, a transfer to non-EU countries and/or organizations becomes necessary, said transfer will take place in compliance with the applicable legislation. Transfers will be carried out through appropriate safeguards, such as adequacy decisions, standard contractual clauses approved by the European Commission or other legal instruments.

#### **6. Data retention period or criteria for determining the period**

The personal data of the interested party are stored by the owner for the time necessary to fulfill the purposes referred to in paragraph n. 2 (points 1 to 3), as well as for that prescribed by civil, fiscal and regulatory rules and in any case no later than 10 years from the termination of the contractual relationship.

As regards the promotional purposes towards already acquired customers (paragraph 2, point 4) the data of the interested party will be processed until the right of opposition is exercised (which can be activated from the beginning, when individual communications are sent and/or or through direct contact with the owner)

Once the retention periods have expired, the data will be anonymized or deleted, unless retention is necessary for other purposes provided for by express provision of law.

## 7. Rights of the interested party.

The articles from 15 to 21 of the Privacy Regulation give the interested party the right to:

- access to Personal Data, (or a copy of such Personal Data), as well as further information on ongoing processing;
- rectification or updating of personal data processed by the Data Controller, where they are incomplete or not updated;
- deletion of personal data from the Data Controller's databases in the cases provided for by current legislation;
- limitation of the processing of personal data by the Data Controller;
- Obtain a structured, commonly used and machine-readable format for the personal data concerning him;
- opposition to the processing of personal data by the Data Controller (e.g. promotional activities)

The interested party can exercise his rights by writing to SIMEM SPA at the following email address: [privacy@simem.com](mailto:privacy@simem.com)

In any case, you always have the right to lodge a complaint with the competent Supervisory Authority (Guarantor for the Protection of Personal Data).

## 8. Changes to the privacy policy

The owner reserves the right to modify, update, add or remove parts of this information, communicating this to the interested parties.

Information updated in January 2024