

DISCLOSURE ON PERSONAL DATA PROCESSING
pursuant to Art. 13 of Regulation (EU) 2016/679 (GDPR)

Dear Customer, please find below the required information regarding the processing of personal data provided for the conclusion and management of contractual relations.

1. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER AND THE DATA PROTECTION OFFICER (DPO)

The Data Controller is **LUMSON S.p.A.** with registered office at Via Tesino 62/64, Capergnanica (CR), 26010 - Italy, which can be contacted at privacy@lumson.it.

Lumson S.p.A. has appointed a DPO who can be contacted at dpo@lumson.it.

2. SUBJECT MATTER OF DATA PROCESSING

The data processed may be common personal identification and contact data.

Where provided, bank details and data concerning the supplier's financial situation may also be processed.

If the supplier is a natural person, the aforesaid processing concerns also his or her personal data. If the supplier is a legal person, the processing of its data does not fall within the scope of these regulations. However, its employees/collaborators or other individual Data Subjects may, in the name and on behalf of the supplier, provide their personal data in the performance of contracts. In this case, the supplier guarantees that such individuals have been made aware of this disclosure, expressly releasing **LUMSON S.p.A.** from any liability or third-party claim in this respect.

3. PURPOSE AND LEGAL BASIS OF PROCESSING

The personal data provided will be processed exclusively for the following purposes:

- a) to fulfil pre-contractual and/or contractual obligations (with related administrative-accounting purposes) relating to the purchase of products and services of the Data Controller;
- b) to fulfil obligations laid down by law, regulations, EU legislation and other legal provisions issued by supervisory and control bodies (e.g. to fulfil obligations related to the keeping of accounting and tax records);
- c) intra-group reporting activities; internal and external control activities (safety, productivity, quality of services, integrity of assets);
- d) management of any disputes arising;
- e) promotional and/or commercial communications.

The processing of personal data for the purposes indicated above does not require express consent. In compliance with Art. 6 of the aforesaid EU Regulation, the processing is lawful as it is necessary for the execution of the contractual relations between the parties. The processing for promotional and/or commercial communications via e-mail/telephone concerning the Company's future services and initiatives, as established by the Data Protection Authorities for the protection of personal data, is allowed, even in the absence of consent from the Data Subject, provided that they are communications concerning services similar to those subject to the sale or provision of services covered under the contractual relations established between the parties.

It should be noted that the Data Subject has the right at any time to object to the processing of its data for these specific purposes.

4. REQUIRED OR OPTIONAL NATURE OF DATA PROVISION AND CONSEQUENCES OF REFUSAL TO PROVIDE DATA

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The data required for the purposes set out under points (a) to (d) are required to fulfil legal obligations, and to conclude and perform the contracts. Therefore, refusal, even partial, to provide such data will prevent the Controller from establishing and managing said contract relations.

5. DATA PROCESSING METHODS

Personal data are processed for the purposes described above both on paper and in electronic format, using electronic (including portable devices) or otherwise automated tools, in compliance with the regulations in force with regard in particular to confidentiality and security and in accordance with the principles of fairness, lawfulness, transparency and protection of the rights of the Data Subject.

Data are processed directly by the organisation of the Data Controller and/or its specially appointed and instructed employees.

6. COMMUNICATION, DISSEMINATION AND TRANSFER

Within the limits that are strictly pertinent to the above obligations, tasks and purposes and in compliance with the relevant legislation in force, personal data may be communicated to the following categories of subjects:

1. those to whom such communication must be made in order to fulfil or demand the fulfilment of specific obligations provided for by laws, regulations and/or EU legislation;
2. the banks used by the Data Controller for payment transactions, as well as the parties operating therein, for the sole purpose of the administrative and accounting management of the contract/relation and for feedback concerning payments;
3. external natural and/or legal persons, professionals whom the Data Controller uses for advice or assistance in the performance of its business, such as lawyers, tax and labour consultants, auditors, supervisory bodies, certification bodies, forwarding agents, IT and security consultants, etc. These parties will operate, where applicable, as external Data Processors and will receive, from the Data Controller, precise instructions on the processing methods pursuant to Art. 28 of the GDPR;

The complete and up-to-date list of Data Processors that are external to the Data Controller's organisation can be consulted by sending a request to the Data Controller at the following e-mail address: privacy@lumson.it.

Personal data will not be disseminated in any way.

Personal data are stored on servers located within the European Union.

However, due to the international nature of our company, we may transfer data to entities based in countries outside the European Economic Area (non-EU countries), including group companies, affiliated companies and third-party companies.

In such cases, in order to ensure the highest level of data protection, the Company will, if necessary, adopt Standard Clauses or Binding Corporate Rules (BCRs) for the extra-EEA transfer of personal data in accordance with the data protection laws of the European Union.

7. PERSONAL DATA STORAGE PERIOD

In compliance with Art. 5(1)(e) of Regulation (EU) 2016/679, personal data shall be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data are processed. Data storage is also determined on the basis of current legislation on the storage of accounting records and, specifically, presently for 10 years.

8. RIGHTS OF THE DATA SUBJECT

According to the European Regulation, Data Subjects have the right to request from the Data Controller access to their personal data (Art. 15), rectification (Art. 16), erasure of data (or right to be forgotten) (Art. 17), restriction

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of processing of personal data concerning them (Art. 18), objection to their processing (Art. 21). Where personal data processing is based on the express consent of the Data Subject, pursuant to Art. 7(3) of the Regulation, the Data Subject may withdraw consent at any time.

Such requests may be made to the Data Controller.

Data Subjects also have the right to lodge a complaint with the relevant Data Supervisory Authority (Art. 77 of the Regulation) if they consider that the processing carried out by the Controller is not compliant.

9. CHANGES TO THIS DISCLOSURE

This disclosure is subject to change. It is therefore advisable to refer at all times to the most up-to-date version that can be consulted at the Data Controller's premises.

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Cod. fisc. e Part.IVA IT04638920969 - REA num. 164608 Cap. Sociale 21.538.462,00 € int. versato

CERTIFICATE N°1073 - UNI EN ISO 9001 : 2015
CERTIFICATE N°175 - UNI EN ISO 14001 : 2015
CERTIFICATE N°093 - UNI EN ISO 45001 : 2018

