

CUSTOMERS AND SUPPLIERS PRIVACY NOTICE

Hereby, Ostificio Prealpino Srl, with its registered office and operational headquarters in Bergamo, Via Vincenzo Angelo Orelli 6, Tax Code and VAT number 01499630166 (hereinafter, the "Company"), informs you, in your capacity as data subject, that the personal data of the data subject, their employees or agents, which is provided, will be processed in accordance with this Personal Data Processing Notice and in compliance with Article 13 of the European Regulation No. 679/2016 concerning the protection of personal data (GDPR).

In accordance with these rules, we provide you with the necessary information regarding the processing and protection of the personal data provided, which we invite you to read carefully.

The Company informs you that the processing of personal data will be based on the principles of lawfulness, fairness, transparency, purpose limitation, storage limitation, data minimization, accuracy, integrity, and confidentiality.

Therefore, personal data will be processed in accordance with the applicable legal provisions and confidentiality obligations contained therein.

DEFINITIONS

- **Personal data:** Any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, particularly by reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.
- **Processing:** Any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- **Genetic data:** Personal data relating to the inherited or acquired genetic characteristics of a natural person that provide unique information on the physiology or health of that individual, particularly from the analysis of a biological sample from the person.
- **Biometric data:** Personal data obtained through specific technical processing related to the physical, physiological, or behavioral characteristics of a person that allow or confirm the unique identification of that individual, such as facial images or fingerprint data.
- **Health data:** Personal data concerning the physical or mental health of a natural person, including the provision of health care services, which reveal information about their health status.

LOCATION OF DATA PROCESSING

Data collected on paper are stored at the legal and operational headquarters of the Company, located at Via Vincenzo Angelo Orelli 6, Bergamo, while data stored digitally are kept on servers within the aforementioned premises.

The data will be accessible only if strictly necessary for the purposes outlined in this notice, by employees of the Data Controller who are authorized and/or designated as responsible for data processing, specifically:

- Administrative staff
- Logistics staff

You may consult the updated list of Data Processors and authorized personnel operating under the direct authority of the Data Controller by submitting a written request to:

- By certified email (PEC): ostificioprealpino@pec.it or by regular email: privacy@ostificioprealpino.com
- By registered mail to the address of the registered office.

TYPES OF DATA PROCESSED

The processing concerns personal and identifying data provided by the data subject (for example but not limited to: name, surname, address, VAT number, tax code, landline or mobile phone number, email address, bank details, etc.).

PURPOSES, LEGAL BASIS, AND MANDATORY OR OPTIONAL NATURE OF THE PROCESSING

The personal data provided will be processed by the Data Controller for the following purposes:

- Fulfillment of contractual and legal obligations, especially with regard to tax and anti-money laundering regulations.
- Administrative purposes (e.g., invoicing, order management, preparation of offers, etc.).

The legal basis for the processing is the contract with the customer/supplier.

PROCESSING METHODS AND DATA RETENTION

Processing will be carried out in automated and manual forms, using methods and tools designed to ensure maximum security and confidentiality, carried out by individuals designated as responsible and authorized for data processing under the applicable regulations.

The data will be retained for no longer than necessary to fulfill the purposes for which the data were collected and subsequently processed, and in any case for the duration of the contractual or commercial relationship in place. Specifically:

- For 10 (ten) years for administrative and accounting activities, as required by Article 2220 of the Italian Civil Code.

COMMUNICATION AND DISCLOSURE OF DATA

The data subject's personal data will not be disseminated, unless explicitly authorized by the data subject following appropriate information.

However, the data may be communicated to companies contractually linked to the Data Controller and, where necessary, to subjects within and outside the European Union, in accordance with and within the limits of the GDPR.

The data may be communicated to third parties belonging to the following categories:

- Service providers for the management of the information system used by the Data Controller, including maintenance of technological components (such as email and newsletter services);
- Freelancers, studios, or companies providing assistance and consulting services;
- Entities performing compliance, auditing, and certification activities related to the Data Controller's operations;
- Competent authorities for compliance with legal obligations and/or public body provisions, upon their request.

The processed identification data, as part of corporate security procedures, will not be communicated, unless expressly requested by the competent judicial or investigative authorities. Any further communication or dissemination will occur only with explicit consent from the data subject.

NATURE OF DATA PROVISION AND REFUSAL

For data that we are required to know in order to fulfill obligations arising from existing contracts and obligations set by laws, regulations, EU legislation, or instructions from legally authorized authorities or supervisory bodies, failure to provide such data will result in the inability to establish or continue the relationship, to the extent that such data are necessary for the execution of the contract.

The Data Controller also informs that failure to communicate or incorrect communication of any mandatory information will result in the following consequences:

- The inability of the Data Controller to ensure the conformity of the processing with the contractual terms for which it is performed;
- The potential failure to comply with tax, administrative, and civil obligations to which the processing is subject.

DATA TRANSFER ABROAD

Personal data will not be transferred to third countries outside the EU.

RIGHTS OF THE DATA SUBJECT

Finally, we inform you that you may exercise your rights at any time with respect to the Data Controller, in accordance with the Applicable Regulations. These rights include the right to request confirmation of whether or not personal data exists, to know its content and origin, to verify its accuracy, to request its integration, updating, or rectification. Under the conditions set out in the Applicable Regulations, you have the right to request rectification and deletion, restriction of processing, data portability, and to object to processing for legitimate reasons.

In accordance with Articles 15 and following of the GDPR, the legal representative of the Company, as the data subject, may exercise their rights, including:

- Right of access to data and related information
- Right to rectification of inaccurate data and completion of incomplete data
- Right to erasure of data (e.g., in case of disputes or unlawful processing)
- Right to file a complaint with the supervisory authority
- Right to data portability
- Right to object to data processing (e.g., in cases of profiling, marketing, or scientific, historical research purposes)
- Right to file a complaint with the Data Protection Authority.

Requests should be addressed via certified email (PEC) or email to the Data Controller.

The Data Controller will inform the data subject of the action taken in response to the request within one month of receiving the request. This period may be extended in the case of complex requests, with prior communication to the data subject.