

## POLICY FOR CUSTOMER AND SUPPLIERS

### Processing of personal data

Art. 13 of D.Lgs. 196/2003, as amended by D.Lgs. 101/2018, and art. 13 of the General Data Protection

Regulation EU 679/2019

Doc. SGD INFO 2 – Rev. 01 del 17.12.2018

IMP S.p.A., with registered office in Via F.lli Cairoli, 17 – 20851 Lissone (MB) and headquarters in Via Grazia Deledda, 12/14 - 21047 Saronno (VA), CF 04102200153 (hereinafter referred to as the "Data Controller"), as Data Controller, informs you pursuant to D.Lgs 196/2003, as amended by D.Lgs. 101/2018 (hereinafter referred to as the "Privacy Code"), and to art. 13 of the General Data Protection Regulation EU 679/2016 (hereinafter referred to as the "GDPR") that your data will be processed in the manner below and for the following purposes.

#### 1. Subject of the processing

The Data Controller processes personal data (such as name, surname, company name, address, telephone number, e-mail address, bank and payment details) - hereinafter referred to as the "personal data" or even "data" - that you have communicated on the occasion of pre-contractual activities or the conclusion of contracts for the supply of goods and/or services of the Data Controller.

#### 2. Processing purpose

Your personal data are processed, pursuant to Privacy Code and to art. 6 lett. b), e) GDPR, without need of express consent for the following purposes.

- *contractual*. Entering into contracts for the supply of goods and/or services of the Data Controller; fulfilling the pre-contractual, contractual and tax obligations deriving from relations with you;
- *administrative and accounting*. For the purposes of the application of the provisions regarding the protection of personal data, the processing performed for administrative-accounting purposes are those related to the performance of organizational, administrative, financial and accounting activities, regardless of the nature of the data processed. In particular, these objectives are pursued by internal organizational activities, those functional to the fulfillment of contractual and pre-contractual obligations, the management of the employment relationship in all its phases, the keeping of accounting and the application of the rules on tax, trade union, social security, health, hygiene and safety at workplace matters;
- *informative and promotional*. The use of e-mail coordinates provided by the customer in the context of the sale of a product or service for the direct sale of their products or services, is permitted for the purpose of sending information and newsletters. The Data Subject, at the time of collection and at the time of sending each communication, is informed of the possibility of opposing the treatment at any time, easily and for free. To unsubscribe from the mailing list it will be sufficient to write at any time to the e-mail address indicated in par. 8 of this document or by mail to the physical address of the Data Controller indicated above (headquarters) with the subject "mailing list cancellation";
- *security, pursuant to D.lgs. 81/2008*. With particular reference to the identification data freely given

## POLICY FOR CUSTOMER AND SUPPLIERS

### Processing of personal data

Art. 13 of D.Lgs. 196/2003, as amended by D.Lgs. 101/2018, and art. 13 of the General Data Protection

Regulation EU 679/2019

Doc. SGD INFO 2 – Rev. 01 del 17.12.2018

by the visitor/guest to our offices (name, surname, institution or company), the processing has the exclusive purpose of ensuring compliance with the corporate security procedures formally applied, even in force of the regulations in force (i.e. registration in the visitor register/database, assignment of temporary identification badge, applications of legal obligations in the field of safety at workplace);

- *exercising the rights of the Data Controller and the right of defense in Court.*

### 3. Processing methods

The processing of your personal data is carried out by means of the operations set forth in Privacy Code and art. 4 n. 2) of the GDPR and more precisely: collection, registration, organization, storage, consultation, processing, amendment, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your personal data are subjected to both paper and electronic and/or automated processing.

The Data Controller will process the personal data for the time necessary to fulfill the aforementioned purposes and in any case for no more than 10 years from the termination of the relationship for contractual, administrative and accounting, security and judicial purposes and for no more than 5 years from data collection for informative and promotional purposes.

### 4. Access to data

Your data may be made accessible for the purposes referred to in par. 2 of this document to:

- employees and collaborators authorized by the Data Controller;
- Data Processors and System Administrators designated by the Data Controller;
- third-party companies or other subjects (for example, credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, third party technical service providers, postal carriers, hosting providers, IT companies, communication agencies, etc.) that perform outsourced activities on behalf of the Data Controller, appointed, if necessary, as Processing Managers;
- subjects that provide services for the management of the information system used by the Data Controller and telecommunications networks and that take care of the maintenance of the technological part (including emails and newsletters);
- freelancers, firms or companies in the field of assistance and consultancy relationships;
- subjects that carry out checks, audits and certification of the activities carried out by the Data Controller;
- competent authorities for the fulfillment of obligations of laws and/or provisions of public bodies, at



## POLICY FOR CUSTOMER AND SUPPLIERS

### Processing of personal data

Art. 13 of D.Lgs. 196/2003, as amended by D.Lgs. 101/2018, and art. 13 of the General Data Protection

Regulation EU 679/2019

Doc. SGD INFO 2 – Rev. 01 del 17.12.2018

their request.

Your data may also be processed, on behalf of the Customer, by professionals and/or companies in charge of carrying out technical, development, management and administrative-accounting activities.

#### 5. Data transfer

The Data Controller processes personal data by implementing appropriate security measures to prevent unauthorized access, disclosure, amendment or destruction of personal data. Processing is carried out using IT and/or telematic tools, with organizational and with logic methods strictly related to the purposes shown. Personal data are processed at the registered office of IMP S.p.A., and through the use of servers, which are made available by third-party providers and which are located within the European Union; for more information, please contact the Data Controller. In any case, it is understood that the Data Controller, if necessary, will have the right to move the servers even outside the EU. In this case, the Data Controller hereby ensures that the transfer of non-EU data will take place in accordance with the applicable legal provisions, subject to the signature of contracts that provide for the procedures set out in Chapter V of the GDPR.

#### 6. Nature of providing data and consequences of refusing to answer

Failure to provide the data necessary for the execution of the contract, necessary for the fulfillment of obligations under laws, regulations, community legislation or provisions issued by the Authorities legitimated by law and by supervisory and control bodies, or necessary in order to comply obligations arising from existing contracts, make it impossible to establish or continue the relationship.

Data provision aimed at sending commercial communications by the Data Controller is optional. You can exercise your right to object to this last treatment at any time, according to procedures set out in the following par. 8 and for free. Cancellation request from mailing list can be sent at any time to e-mail address or to the address indicated in par. 8, referring to "mailing list cancellation".

#### 7. Rights of the Data Subject

In your capacity as Data Subject, you have the rights set forth in Articles 15-21 of the GDPR and specifically: obtaining confirmation of the existence of data, knowing data content and origin, verifying data accuracy, requesting data integration, updating, correction, deletion, limitation of processing, portability, and opposing, for legitimate reasons, to their processing.

Where applicable, Data Subject also has the right data are forgotten, as well as the right to complain to the Guarantor.

## POLICY FOR CUSTOMER AND SUPPLIERS

### Processing of personal data

Art. 13 of D.Lgs. 196/2003, as amended by D.Lgs. 101/2018, and art. 13 of the General Data Protection

Regulation EU 679/2019

Doc. SGD INFO 2 – Rev. 01 del 17.12.2018

#### 8. How to exercise the rights

You can exercise your rights at any time by sending:

- a registered letter with return receipt to **IMP S.p.A.**, Via Grazia Deledda, 12/14 - 21047 Saronno (VA) CP 187
- an e-mail to [imp@pec.imp-spa.com](mailto:imp@pec.imp-spa.com)

#### 9. Contract termination due to opposition to data processing

The impossibility to continue the execution of the contract due to the exercise of the right to opposition to data processing involves the termination of the contractual relationship and the onset of the right of withdrawal from the same, regulated and governed and exercisable under the conditions and terms provided for by each specific contract.

The updated list of Data Processors and Data Managers is kept at Data Controller headquarters.

Data Controller: IMP S.p.A.

Registered Office: Via F.lli Cairoli, 17 - 20851 Lissone (MB)

Headquarters: Via Grazia Deledda, 12/14 - 21047 Saronno (VA)

Chairman of the Board: Gabriele Lorenzo Malvestiti

  
**imp SpA**  
Malvestiti Gabriele Lorenzo  
Presidente del Consiglio di Amministrazione