

Dear Customer,

SP METALLO S.r.l., Data controller, informs you in accordance with the applicable national law 196/2003 and the European Privacy Regulation n. 679/2016 ("GDPR") on the purposes and modalities of processing of personal data.

a) Type of data processed

SP METALLO S.R.L. uses the following data, classified as **NOT SENSITIVE**¹:

- Personal data, such as company name, name and surname of legal representatives, contact people/coordinators/office/area managers, telephone numbers, email addresses, VAT codes.

Your explicit consent is NOT required for such data because they will be considered necessary for the execution of the works entrusted to SP Metallo s.r.l. in accordance with GDPR, and therefore the signature is not required for acceptance of this information.

¹**SENSITIVE DATA** (art.9 GDPR): ethnic origin, political opinions, religious or philosophical beliefs, union membership, genetic data, biometric data.

b) Who has access to data?

The Data Processing occurs through manual, computer or telematic tools, suitable to guarantee security and confidentiality and will be performed by the instructed staff of SP Metallo srl. The data in our possession will be processed by:

- Commercial department to carry out activities related to requests for quotes and related issues and management orders
- Technical department for the drawing management and specifications provided by the customer for the work to be carried out
- Quality responsible for the complaint management, the measurement of the level of customer satisfaction through specific questionnaires (part C)
- Administration for all administrative, accounting, civil and tax matters.

c) Data provided to Third parties – Marketing activities, surveys/Market research – Newsletter

Your data are not used by third parties except data related to the payment management at credit institutions. If requested the data in our possession will be available to other control bodies, such as the judicial authority, the revenue agency. Surveys and / or market surveys through external companies are not carried out by SP Metallo s.r.l.. With regard to the Questionnaires sent to you by Our quality responsible may send satisfaction questionnaires regarding with our products and related services. These data will be analyzed in order to take appropriate improvement actions. All new customers * of SP Metallo s.r.l. are included in our newsletter system at the acceptance of the first issued offer in order to send notifications about new products, commercial initiatives; the system gives the possibility to unsubscribe at any time.

* New customer = companies which have never purchased SP Metallo products and which have never been included in our IT system.

d) Period of data storage.

The data storage will always take care of minimizing the storage time and in particular:

- Contractual data with all the technical documentation will be kept for a maximum **period of 10 years** in order to let us adequately manage the established relationship with the client to respond to any dispute
- Administrative / accounting data for a maximum period of 10 years in compliance with the current tax legislation
- Data related to NOT accepted quotes for new customers (customers not present in our databases) will be kept for a maximum period of 5 years and then definitively rejected.

e) Profiling

SP Metallo s.r.l. does not perform any profiling activity².

² Article 4 of the GDPR defines profiling as "any form of automated personal data processing consisting in the use of such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or foresee aspects concerning professional performance, the economic situation, health, personal preferences, interests, reliability, behavior, location or movements of natural people

f) The rights of the Data Subject

We inform the customer that they will be able to exercise any right according to the applicable law, including and not limited to:

- the right to access their personal data (to know the origin, the purposes of the processing, who they have been communicated to, the data storage period or the useful criteria to determine it);
- if no longer necessary, incomplete, incorrect or collected in violation of the law to request the correction, cancellation ("oblivion");
- to request that the processing would be limited to a part of the information, always allowing SP Metallo s.r.l. to properly manage the employment relationship established with the client.

Tolentino li 15/05/2019