

## **CUSTOMER AND SUPPLIER PRIVACY POLICY**

Metalleghes SpA, in its capacity as Data Controller, is hereby informing you that Regulation (EU) 2016/679 (GDPR) and D.lgs. n. 196/2003 now regulates the protection of personal information. Metalleghes bases its data processing on the principles of correctness, lawfulness, transparency and necessity, as provided for by the aforementioned Regulation.

Therefore, we are now providing you with the following information pursuant to Article 13 of the GDPR.

### 1. Purpose of the processing

The processing of your personal data is aimed exclusively at achieving the following purposes:

- a) to meet the preliminary requirements for the drafting and execution of sales contracts, or any other contract concerning the company's business operations and for the performance of those contracts and for the protection of any credit positions arising from them, to meet normal internal operational, management and accounting requirements and to meet any type of obligation provided for by any current applicable laws or regulations, especially fiscal legislation;
- b) for sales and/or marketing purposes;
- c) for profiling.

Granting consent for the purposes referred to in point 1 letter a) is not necessary and the applicable processing is mandatory and may be undertaken without the consent of the data subject. Failure to provide the data will make compliance with the commitments undertaken and arising from existing contractual and pre-contractual relations impossible.

If we proceed to the processing also for the purposes referred to in point 1 lett. b) and c), we would ask for data subjects's consent, where necessary. Provision of the data for the purposes referred to in point 1 letters b) and c) is optional and is to be undertaken pursuant to the procedures set out in Article 7 of the GDPR. Marketing communications may take place through traditional (surface mail or by telephone) or electronic means (email). If you are already one of our customers and you do not object, we may send you sales communications about services similar to those you are already using.

### 2. Data processing procedures

Data processing may comprise, in addition to its collection, its recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, block, communication, cancellation or destruction, pursuant to Article 4, point 2) of the GDPR. Processing may be undertaken using either paper or electronic, computer and telematic means, with the application of procedures and instruments that will ensure the security and confidentiality of the same data. All appropriate technical and organisational data protection measures will be taken to meet all legal requirements and to protect the rights of the data subjects.

Starting with the receipt and/or update of the personal data, it will be stored for a period that is consistent with the purposes of the processing indicated in point 1 and in any case as provided for by law. For additional information on the time limits for storing personal data, see the Privacy Policy page on the company website: <https://www.metalleghegroup.com/> .

### 3. Communication and dissemination of the data

The data, which will not be disseminated, will be processed by company employees, who operate as authorized data processors according to their instructions and the duties they perform. The data may be disclosed to external parties including Data Controllers appointed pursuant to Article 28 of the GDPR. Specifically, the data may be disclosed to the categories of individuals listed below, which include but are not limited to: banks and companies specializing in payment management and credit insurance, law offices and consulting firms, parties responsible for the audit of the company's financial statements, public authorities or administrations for compliance with the law, Italian and foreign suppliers, finance companies. and transport firms.

A detailed list of Data Processors is available at the registered offices of Metalleghe SpA.

For all the purposes indicated in this policy notice, your data may also be transmitted abroad, inside and outside the European Union, in compliance with the rights and guarantees provided for by current legislation, subject to verification that the country in question provides an “adequate” level of protection pursuant to the provisions of the GDPR.

### 4. Rights of the data subjects

In relation to the aforementioned data, all the rights referred to in Articles 15, 16, 17, 18, 20 and 21 of the GDPR may be exercised, in particular, the right to:

- a) access personal data;
- b) correct the data if not accurate;
- c) delete data;
- d) restrict its processing;
- e) object to its processing;
- f) data portability, i.e. the right to receive the personal data provided in a structured format, in common use and readable by an automated device, and to have the data transferred to another Data Controller without hindrance. In the event of any breach of these provisions, the data subject shall have the right to lodge a complaint with the competent supervisory authority.

### 5. Withdrawal of consent

Consent may be withdrawn at any time. This shall be without prejudice to the lawfulness of the processing based on the consent given before withdrawal and any further processing of the same data on a different legal basis than the same consent, such as compliance with contractual obligations or the law.

For additional information about this privacy policy, or to exercise your rights or withdraw your consent, please contact us at [privacy@metalleghe.it](mailto:privacy@metalleghe.it).