

PRIVACY POLICY

Subject: Information on the processing of your personal data pursuant to art. 13 of Regulation (EU) 2016/679

Pursuant and consequent to the provisions of Decree 196 dated June 30, 2003 (as amended) - Code for the protection of personal data (hereinafter, the "Code") - and the General Data Protection Regulation (EU) 2016/679, you are informed that your personal data will be processed by the Controller of Data Processing specified below.

The following definitions are listed here for clarity:

Processing: any operation or set of operations which is performed on personal data or on sets of 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.

Personal data: any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an on-line identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

1. IDENTITY AND CONTACT DETAILS OF THE CONTROLLER OF DATA PROCESSING (hereinafter also referred to as the "Controller" for brevity)

Company name: GranitiFiandre S.p.A.

Address: Via Radici Nord 112 – 42014 Castellarano (RE), Italy

VAT No.: 01411010356

Telephone: +39 0536 819611

E-mail: privacy@granitifianдре.it

Data Protection Officer (DPO) contact e-mail: dpo@granitifianдре.it

DATA SUBJECTS: Customers/Prospects

2. OBJECT, PURPOSES AND LAWFULNESS OF PROCESSING

a. **Purposes and Object:** Contractual or commercial. Provide the requested service, namely to make an offer or execute a contract signed by the parties.

Categories of data processed: Personal details, telephone numbers, business name, tax code and other identification numbers, banking details and e-mail address of the Data Subject.

Methods of providing the data: paper-based form, verbal, e-mail, telephone, web

Lawfulness: This processing is lawful pursuant to art. 6, para. 1, letter B of the General Data Protection Regulation (EU) 2016/679.

Categories of parties that may become aware of the personal data - Recipients:

Your Personal Data may be made accessible, for the above-mentioned purposes or in fulfillment of legal obligations or for the performance of activities instrumental to the above-mentioned purposes, to:

- workers of the Controller, specifically appointed and authorized for this purpose, for specific processing operations;

Categories of External Processor that may be appointed:

- Third-party companies specializing in the management of commercial and credit-related information (e.g. data processing centers, banks, etc.);

- Couriers;

- Companies and/or collaborators for contract management or management/administrative/accounting services used to fulfill their legal or contractual obligations;

Other parties (firms, companies, natural persons) that collaborate in the implementation of the contracted services or related support services (e.g. sector specialists, IT consultants, etc.).

The agreements signed with such parties restrict their processing to the indispensable and guarantee the confidentiality, security, completeness and accuracy of the data.

The Personal Data may be transferred to Independent Controllers, such as Banks, Insurance Companies and Public Supervisory and Control Authorities.

Refusal to allow processing: Despite being rights granted to the Data Subject, any refusal to provide personal data or allow its processing will make it impossible to continue the commercial relationship.

Objections may be made using the contact details provided in section 1

Please note that under no circumstances will the collected data be disseminated or used for any other purpose.

b. **Purposes and Object:** Soft Marketing. The e-mail contact data you have provided to us will be processed for soft marketing activities, such as the promotion for advertising purposes of services similar to those in which you have expressed an interest by using one of our specific products/services, only and exclusively in the mutual and legitimate interest of both parties. The activity will take place via contact by e-mail, maintaining a low contact frequency.

Categories of data processed: Master data and e-mail address.

Methods of providing the data: paper-based form, e-mail, telephone, web.

Lawfulness: This processing falls within the scope of lawful processing as defined in art. 130, para. 4, of Decree 196 dated June 30, 2003, the "Data Protection Code", as amended by Decree 101 dated August 10, 2018. Please note that *"if the Data Controller uses the e-mail addresses provided by the Data Subject for processing in order to make or facilitate direct sales of its own products or services, it may refrain from requesting the Data Subject's consent."*

The Data Subject may object to the above processing at any time, in a simple manner and without charge, both on the receipt of e-mails and, beforehand, on receipt of this document.

Categories of parties that may become aware of the personal data - Recipients:

Your Personal Data may be made accessible, for the above-mentioned purposes or in fulfillment of legal obligations or for the performance of activities instrumental to the above-mentioned purposes, to:

- workers of the Controller, specifically appointed and authorized for this purpose, for specific processing operations;

Categories of External Processor that may be appointed:

- Persons performing services of a technical, organizational, professional or operational nature on behalf of the Controller for the achievement of the stated purposes.

- Persons performing IT, legal and other services on behalf of the Controller to support the achievement of the stated purposes.

- Persons performing commercial and marketing services on behalf of the Controller in compliance with the limits and restrictions specified in the preceding paragraphs.

The agreements signed with such parties restrict their processing to the indispensable and guarantee the confidentiality, security, completeness and accuracy of the data.

Refusal to allow processing: The Data Subject may object to the above processing at any time by sending a communication to the e-mail address of the Controller stated in section 1 or by following the indications in each e-mail communication (OPT-out). The right to revoke consent at any time does not affect the lawfulness of the processing prior to revocation.

Objections may be made using the contact details provided in section 1

Please note that under no circumstances will the collected data be disseminated or used for any other purpose.

3. DURATION OF PROCESSING

The data will be processed for a maximum of 10 years after collection.

4. PERSONAL DATA PROCESSING TOOLS AND LOGIC

In relation to the purposes mentioned herein, processing takes place using manual, computerized and electronic data transmission tools, in ways that are consistent with the aforementioned purposes and, in any case, in order to guarantee the security and confidentiality of the data.

5. RIGHTS OF THE DATA SUBJECT

All the rights mentioned below can be exercised by using the contact details of the Controller provided in section 1 of this document

- Right of the Data Subject to request the Controller for access to his/her personal data
- Right of the Data Subject to request the Controller to rectify / delete / restrict the processing of his/her personal data
- Right of the Data Subject to object to the processing of his/her personal data by the Controller
- Right of the Data Subject to receive a complete list of the appointed Processors
- Right to lodge a complaint with a supervisory authority such as the Italian Data Protection Authority (Garante), using the contact details provided at the following link <https://www.garanteprivacy.it/home/footer/contatti>

There are no automated decision-making processes, including the profiling referred to in art. 22, paras. 1 and 4, of General Data Protection Regulation (EU) 2016/679 and, should such cases arise, significant information about the logic used and the importance and consequences of such processing for the Data Subject will be provided.

6. DATA TRANSFER ABROAD

No foreign transfers made.