

PRIVACY POLICY INFORMATIVE NOTICE
PURSUANT TO ARTICLES. 13-14 OF THE EU REG. 2016/679 (GDPR)

Dear Customer,

With this notice, **WINDTEX VAGOTEX S.p.A.** wishes to inform you about the processing of the personal data concerning you, acquired also verbally, directly or through third parties, which are necessary for performing the administrative, accounting, management and contractual services connected to or deriving from the execution of the contract. This informative notice is issued in accordance with the provisions laid down in articles 13-14 of the EU REG. 2016/679 (so-called GDPR), as well as Legislative Decree 196/2003 as amended by Legislative Decree 101/2018.

1. IDENTITY AND CONTACT DATA OF THE DATA CONTROLLER.

The Data Controller (hereinafter, also "Controller") is the company WINDTEX VAGOTEX S.p.A. with registered office in Viale del Lavoro no. 15, postcode 37030 – Colognola ai Colli (VR), tax code and VAT no. 00895500239,

R.E.A. (Administrative and Economic Index) no. VR-165115, share capital paid up € 649,999.80, tel. +39 045 6159111, fax +39 045 6152060, email info@vagotex.it, PEC (public certified email) italina@legalmail.it.

2. PURPOSES OF THE DATA PROCESSING.

Pursuant to articles 6 and 7 of the GDPR, it is specified that the processing of personal data is necessary in relation to contractual and pre-contractual requirements (including even the mere storage of personal data as a potential customer) and in relation to the execution of administrative, accounting and management obligations inherent and/or connected to the contract signed by you, and the obligations provided for by law, the regulations and national and/or community standards governing contractual, accounting and tax matters, as well as to achieve effective management of the commercial relations.

The email addresses provided may be used to send promotional or informative material via email, and in general for commercial communication activities.

3. LEGAL BASIS OF THE PROCESSING.

3.1. In view of the fact that the processing of data is necessary for the execution of a contract to which the data subject is a party, or the execution of precontractual measures adopted at the request of the same, the legal basis of the processing is that provided for in Article 6, paragraph 1, letter C) of the GDPR for everything regarding the fulfilment of legal obligations connected to or deriving from the contract.

3.2. For the purpose of sending commercial communications by email for products similar to those already purchased that fall within the so-called "Soft spam", the legal basis is the legitimate interest of the Controller pursuant to art. 6 paragraph 1 letter F) in conjunction with recital 47 of the GDPR. This applies to customers who have or have had a contractual or pre-contractual relationship with the Data Controller and have expressed an interest in receiving commercial communications or in any case reasonably expect this type of communication, as it is in line with their own interests. The legitimate interest exists even when they have been inserted on the mailing list for some time, revealing their interest to remain there and therefore to receive commercial communications due to the permanence that has continued over time.

4. METHODS OF PROCESSING THE DATA.

The processing will be carried out with electronic, computerised, automated, and also paper means.

The processing is carried out by the Controller and by the collaborators and/or employees of the Controller assigned as data processors, as well as by third-party processors specifically identified in writing, within the scope of their respective functions and in compliance with the instructions given by

the Controller, ensuring the use of suitable measures for the security of the processed data and guaranteeing their confidentiality.

In accordance with the provisions of the Regulations, the processing carried out by the Controller will be based on the principles of lawfulness, correctness, transparency, limitation of purposes and storage, minimisation of data, accuracy, integrity and confidentiality.

The data will always be processed in the utmost observance of the principle of confidentiality even in the case of management of the same by third parties expressly appointed by the Controller.

Your data will not be subject to any automated decision-making processes.

5. RECIPIENTS OF THE PERSONAL DATA.

The personal data you provide may be disclosed to the Controller, the appointees and/or the Data Processors. The list of Data Processors is available on request. Any additional categories of recipients that may gain knowledge your personal data during or after the execution of the contract include:

1. the subjects who process the data in compliance with specific legal obligations;
2. credit institutions that provide functional services for the purposes referred to in point 2;
3. companies operating in the transport and shipping sectors;
4. external consultants who provide functional services, deriving from or connected to the purposes referred to in point 2, identified in writing and to whom specific written instructions have been given with reference to the processing of personal data;
5. companies or professionals for the judicial or extrajudicial protection of the rights of the Data Controller;
6. in general, all those public and private subjects for which or whom the communication is necessary for the correct and complete fulfilment of the purposes indicated in point 2.

6. COMMUNICATION OF DATA.

Your data may be communicated to the subjects indicated in point 5 above for the purposes referred to in point 2.

7. DISSEMINATION OF DATA.

Unless specifically requested in writing, or with an explicit order of the Supervisory Authority/regulatory obligation, the personal data you provide will not be subject to dissemination.

8. TRANSFER OF DATA ABROAD.

The data collected will not be transferred to third countries or international organisations.

9. STORAGE PERIOD.

The data you provide will be stored during the execution of the contract and for a period of ten years following the termination/completion of the same in order to fulfil the tax and accounting obligations, as well as for judicial protection in the event of disputes arising with regard to said contract.

As regards the activity of sending commercial communications by email, the data will be kept until such time as you object to the same.

This information will also be considered valid for any subsequent contracts you may enter into with the Controller.

10. RIGHTS OF THE DATA SUBJECT.

The regulations entitle the data subject to exercise specific rights listed in the articles from 15 to 22 of the GDPR, including the right to obtain confirmation from the Controller as to existence or otherwise of his/her personal data (or the access), to have availability of said data in an intelligible form, as well as the rectification or erasure of the same, or the restriction in whole or in part of the processing, or objection to the same on legitimate grounds and/or revocation of the consent to the processing at any

time (without prejudice to the consequences indicated), as well as to request the portability of his/her data with regard to the data subject to the specific consent, or updating of the same.

The data subject has the right to know the source of the data, the purposes and methods of the processing, the logic applied in the processing, as well as the identification details of the Controller and the subjects to whom the data may be communicated.

The data subject also has the right request transformation into anonymous form, the restriction or blocking of the data processed in violation of the law; he/she may also lodge a complaint regarding the unauthorised processing of the data provided with the Supervisory Authority for the Protection of Personal Data according to the methods published on the website of said authority (see <http://www.garanteprivacy.it/>).

Requests relating to the exercise of the aforementioned rights may be address to the Data Controller at the addresses indicated about without any formalities, or alternatively, by using the form provided by the Supervisory Authority for the Protection of Personal Data that can be found on the following website: <http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>.

The exercise of rights may also be requested by means of written communication sent by PEC (public certified email) to the following address italina@legalmail.it or by registered letter with proof of receipt to the address indicated above.

11. PROVISION OF DATA.

The provision of personal data is not mandatory; however, it is a necessary requirement for the exact execution of the contractual and pre-contractual obligations. The provision of contact data for commercial activities is not mandatory, however, it is necessary in the event that you intend to receive communications relating to the services and promotions offered by the Data Controller.

The Controller specifies that only the data strictly necessary for the conclusion of the contract and the execution of the obligations or legal obligations deriving from the same will be requested.

12. REFUSAL TO PROVIDE DATA.

Failure to provide data by the Data Subject will make it impossible to enter into the contract, carry out the necessary pre-contractual measures, or complete in an exact manner, the fulfilment of the contractual obligations, or the obligations (also legal) deriving from or connected to the contract and, more generally, the impossibility of fulfilling the purposes referred to in point 2.