

# VALMEX S.P.A.

## Customer information

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### Revision history

Date	Revision	Created by	Description of Modification
20.10.2022	1.0	Lawyer Giuseppe Serafini	Draft of the basic document

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**Mandatory data protection information.**  
**Articles 13 - 14 of Regulation (EU) 2016/679.**

Dear Sir / Dear Madam

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 VALMEX S.p.A. (hereinafter the Company), with registered office in Via Fiume, 6 - 61030 - Lucrezia di Cartoceto - (PU), email: [privacy@valmex.it](mailto:privacy@valmex.it) in its capacity as Data Controller (hereinafter "the Company" or "the Controller"), hereby provides you with the following information regarding the processing of your personal data.

Without prejudice to the definitions all set out in Article 4 of the General Data Protection Regulation (EU/2016/679), the following definitions shall apply:

**Valmex S.p.A.:** the set of human, technological, logistic and organisational resources used in the processing operations, consisting of the data, applications, organisational rules and procedures assigned to the acquisition, storage, processing, communication of your personal data.

**I. - Nature of Personal Data.**

**Personal Data.**

The data communicated by you in relation to your personnel involved in the execution and management of contracts with the Company, including name, surname, contact details, e.email addresses, professional qualifications where relevant; any data relating to payroll and/or compensation, contributions paid and the regularity of contributions in relation to the personnel you employ for the provision of services at the Company when such data are required by law (hereinafter referred to as "Data Subjects") - whether provided directly by you or obtained from public sources (Chambers of Commerce) - shall be processed by the Company in accordance with the Regulations and national legislation including any measures issued by the Supervisory Authority (Garante per la protezione dei dati personali) where applicable. In the case of customers who are natural persons, in addition to the data highlighted above, including invoicing and payment data (including VAT number and tax code), bank data and registration with registers or registers, the Company may process data of an economic-financial nature (such as economic solvency).

**II. - Legal basis and purpose of processing.**

The processing of the data of the Interested Parties is carried out by the Company in the performance of its economic and commercial activities for purposes connected with the possible establishment, management and execution of the contractual relationship (including the management of the pre-contractual relationship and/or inclusion in the Customer list.

In particular, data will be processed for the fulfilment of legal and regulatory obligations (e.g. tax and accounting obligations, obligations arising from the regulation of contracts

and hygiene and safety at work): for the opening of the customer registry; the administrative management of contracts, including the management of any litigation, the performance of internal audits (safety, productivity, quality of services, asset integrity), certification.

The data of the Interested Parties may also be processed for periodic activities to assess the existence of the ethical and legal requirements established by the Company in its Code of Ethics and within the scope of audits, also at your premises, of quality, process and product or sustainability. For the processing of data for the above-mentioned purposes, it is not necessary to acquire a specific consent, as the Company can avail itself of the exemptions set out in Articles 6.1 b), 6.1 c) of the Regulation. In the case of customers who are natural persons, for the processing of data of an economic-financial nature, such as commercial information and financial statements, the Company avails itself of the exemption in 6.1 f) (the Company's legitimate interest in verifying the economic-financial soundness of its business partners).

### **III. - Nature of conferment, and modalities of processing.**

The provision of the data of the Interested Parties is necessary and, in the absence thereof, it will not be possible to establish any business relationship, to properly perform pre-contractual and contractual obligations or, where a contractual relationship has already been established, to fulfil the obligations and commitments arising therefrom. Any personal data of the Interested Parties will also be collected through the video-surveillance systems present in the access and exit areas of the Company's premises and inside the premises themselves, if the Interested Parties are present on the Company's premises. The data will be processed and stored on paper and computer media within the Company, including databases located on the Company's intranet or on servers at the Controller's disposal residing abroad, in compliance with Articles 44 et seq. of Gen. Reg. 679/2016 and any subsequent amendments thereto, for a period no longer than is necessary to fulfil legal obligations and pursue the aforementioned purposes, in accordance with the principles of relevance, non-excessiveness and indispensability. The processing may also be carried out by means of automated tools designed to store, manage or transmit the data and, in any event, will be performed in compliance with the provisions of the law in force.

### **IV. - Conservation and Security.**

The data will be stored in accordance with the applicable data protection regulations for as long as is necessary to fulfil the above-mentioned purposes. In particular, the data will be kept for the entire duration of the contractual relationship and also after the termination of the same in compliance with civil and fiscal obligations. The processing of your data will be carried out with the support of paper, computer or telematic means using methods and tools suitable to guarantee, with reference to the state of the art, the confidentiality, integrity and availability of the data, in compliance with the provisions of Article 32 of the General Data Protection Regulation (EU/2016/679), by specially appointed persons, in compliance with the provisions of Art. 29 et seq. of the GDPR 2016/679.

Personal data will be stored within the European Union, its security policies are reviewed in accordance with relevant Best Practices. The logics, also cryptographic, of the

processing will be strictly related to the illustrated purposes. In particular, your data will be stored and/or processed by means of IT procedures, and processed by natural or legal persons who, under contract with the Data Controller, provide specific processing services or carry out activities connected with, instrumental to or in support of those of the Data Controller.

#### **V. - Target audience.**

Your data may be made accessible for the purposes set out in point (I) of this Information Notice: 1) to employees and collaborators of the Data Controller, in their capacity as persons in charge and/or internal and external data processors and/or system administrators identified in writing and to whom specific instructions have been given: employees of the Personnel Department; owners and employees of the payroll processing company, in their capacity as persons in charge or managers; professionals or service companies for company administration and management who work on behalf of the Data Controller. 2) to third-party companies or other entities (by way of example, credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, etc.) that perform outsourcing activities on behalf of the Controller, in their capacity as external data processors.

#### **VI. - Rights of the data subject.**

At any time, you may exercise your rights in accordance with the provisions of sections 2, 3, 4, of Chapter III of Gen. Reg. 679/2003, and in particular:

1. request confirmation of the existence or non-existence of their personal data;
2. to obtain information about the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be disclosed and, where possible, the storage period;
3. obtain rectification and deletion of data;
4. obtain restriction of processing;
5. obtain portability of data, i.e. receive them from a data controller, in a structured, commonly used and machine-readable format, and transmit them to another data controller without hindrance;
6. object to processing at any time and also in the case of processing for direct marketing purposes;
7. to object to automated decision-making relating to natural persons, including profiling.
8. To lodge a complaint with a competent authority, in Italy the Italian Data Protection Authority (Autorità Garante per la Protezione dei Dati Personali), located at 121 Piazza di Monte Citorio, 00186, ROME.

Where applicable, you also have the rights set out in Articles 16-21 GDPR (Right to rectification, Right to be forgotten, Right to restriction of processing, Right to data portability, Right to object), as well as the right to complain to the Data Protection Authority.

You are entitled to withdraw your consent to the processing of your personal data at any time, without prejudice to the lawfulness of the processing based on the consent given before the revocation.

If you wish the processing of your data to be interrupted by means of deletion or destruction of the relevant records or reproductions, you may send us a communication accompanied by a photocopy of your identity document (which will be destroyed immediately. Upon completion of this operation, your personal data will be removed (as specified above) from our archives as soon as possible.

#### **VII. - Owner, manager and appointees.**

The data controller of your personal data is Valmex S.p.A., with registered office in Via Fiume, 6 - 61030 - Lucrezia di Cartoceto - (PU), email [privacy@valmex.it](mailto:privacy@valmex.it), which you can contact to exercise your right of access, asking to obtain confirmation of the existence or otherwise of the data and to know its content and origin, verify its accuracy or request its integration, updating or rectification and to oppose for legitimate reasons to its processing. The updated list of data processors and persons in charge of processing is kept at the registered office of the Data Controller. The names of the System Administrators appointed to manage the Information Systems on which Personal and Sensitive Data transit are available on request from the data subjects.

#### **VIII. - Personal Data Protection Officer.**

Valmex S.p.A. has not appointed a Data Protection Officer, as it is not required to do so pursuant to Article 37 of EU Reg. 679/2016.

This document is subject to future changes or additions due to changes in the relevant legislation.

Lucrezia di Cartoceto, \_\_.\_\_.\_\_\_\_\_

For Valmex S.p.A.  
The legal representative p.t.

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