

VALMEX S.P.A.

Informativa Partecipazione Eventi

Codice:	INFO_EVENT
Revisione:	1.0
Data di revisione:	23.02.2026
Redatto da:	HR / DPO
Approvato da:	Valmex S.p.A.
Livello di Riservatezza	PUBBLICO

Cronologia delle revisioni

Data	Revisione	Creata da	Descrizione della modifica
23/02/2026	1	HR / DPO	Creazione documento

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PRIVACY NOTICE

(pursuant to Article 13 of Regulation (EU) 2016/679 – "GDPR")

Last updated: 23 February 2026

This Privacy Notice is provided by **VALMEX S.p.A.** pursuant to Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council ("GDPR") and describes in full transparency the manner in which your personal data (hereinafter "Personal Data") are processed in the course of the Controller's activities.

1. Identity and Contact Details of the Data Controller

The Data Controller pursuant to Article 4(7) GDPR is:

VALMEX S.p.A. Registered office: Via Fiume, 6 – 61030 – Lucrezia di Cartoceto (PU), Italy Privacy contact: privacy@valmex.it

1.1 Data Protection Officer (DPO)

The Controller has appointed, as a supervisory figure pursuant to Article 37 GDPR, a Data Protection Officer (DPO), in the person of **Avv. Giuseppe Serafini**, reachable at the dedicated e-mail address: dpo@valmex.it. Data subjects may contact the DPO at any time regarding any matter relating to the processing of their Personal Data or the exercise of the rights set out in Section 10 of this Notice.

2. Purposes of Processing

The processing of your Personal Data is carried out by the Controller for purposes that are determined, explicit and legitimate, pursuant to Article 5(1)(b) GDPR, as described in detail below:

- **A. Management of pre-contractual and contractual relationships** Processing is carried out for the purpose of establishing, administratively managing and executing commercial and contractual relationships with the Controller, including registration in company records and the management of orders, invoicing and related operational communications.
- **B. Compliance with legal obligations** Personal Data will be processed to fulfil fiscal, accounting, civil law and any other mandatory obligation imposed by applicable national and European legislation (including, by way of example: Presidential Decree 633/1972, Presidential Decree 600/1973, Legislative Decree 231/2001).
- **C. Verification of ethical and qualitative requirements** Processing is necessary to assess whether the ethical and legal standards set forth in the Controller's Code of Ethics are met, with a view to ensuring conduct consistent with corporate values and applicable regulations.

- **D. Marketing and promotional communications** Subject to the prior collection of your specific, free and unambiguous consent, Personal Data will be used to send commercial and promotional communications relating to the Controller's products and services, by means of electronic communication channels (e-mail, newsletter).

3. Legal Bases for Processing

Every processing operation is grounded on one of the lawfulness conditions exhaustively listed in Article 6(1) GDPR. Specifically:

- For the pursuit of **Purpose A**, processing is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract, pursuant to **Article 6(1)(b) GDPR**.
- For the pursuit of **Purpose B**, processing is necessary for compliance with a legal obligation to which the Controller is subject, pursuant to **Article 6(1)(c) GDPR**.
- For the pursuit of **Purpose C**, processing is based on the legitimate interests of the Controller, consisting in verifying the existence of ethical and qualitative standards within its commercial relationships, pursuant to **Article 6(1)(f) GDPR**. Such legitimate interest has been balanced against the rights and fundamental freedoms of data subjects, who may exercise their right to object at any time pursuant to Article 21 GDPR.
- For the pursuit of **Purpose D**, processing is lawful on the basis of the **free, specific, informed and unambiguous consent** of the data subject, pursuant to **Article 6(1)(a) GDPR**. Consent may be withdrawn at any time, without prejudice to the lawfulness of processing carried out on the basis of consent given prior to its withdrawal.

4. Categories of Personal Data Processed

In compliance with the principle of data minimisation set out in Article 5(1)(c) GDPR, and strictly within the limits necessary to pursue the purposes indicated, the following categories of Personal Data are subject to processing:

- **Identification and contact data:** first name, last name, e-mail address, name of the professional organisation or company of reference.
- **Commercial and relational data:** commercial preferences, order and communication history, information relating to the established commercial relationship.

The Controller does not collect or process, for the purposes described in this Notice, data belonging to the special categories referred to in Article 9 GDPR (health data, genetic data, biometric data, etc.) nor data relating to criminal convictions pursuant to Article 10 GDPR.

5. Data Retention Period

Personal Data are retained for a period no longer than is necessary to achieve the purposes for which they are processed, in accordance with the storage limitation principle set out in Article 5(1)(e) GDPR. Specifically:

- Data processed for **Purposes A and B** (contractual and legal) are retained for the entire duration of the commercial relationship and, following its termination, for a period of **10 years**, in compliance with applicable civil law retention obligations (Article 2220 of the Italian Civil Code) and fiscal regulations.
- Data processed for **Purpose C** (ethical requirements verification) are retained for the duration of the commercial relationship and for the period strictly necessary to manage any related disputes.
- Data processed for **Purpose D** (marketing) are retained until the **withdrawal of consent** or the exercise of the right to object by the data subject and, in any event, for a maximum period of **24 months** from the date of their collection.

Upon expiry of the applicable retention periods, Personal Data will be permanently deleted or rendered irreversibly anonymous.

6. Source of the Data

The Personal Data subject to processing have been collected **directly from the data subject**, at trade fairs and commercial events attended by the Controller.

7. Recipients and Disclosure of Data

Personal Data are not subject to indiscriminate disclosure. They may be communicated exclusively to the following categories of recipients, strictly within the limits necessary to pursue the stated purposes:

- **Authorised internal personnel:** employees and collaborators of the Controller who have been previously authorised to process data pursuant to Article 29 GDPR, acting under the direct authority of and in accordance with the instructions of the Controller (so-called “authorised persons”).
- **External Data Processors:** third-party service providers operating on behalf of the Controller on an outsourced basis (including, by way of example: IT and cloud computing service providers, e-mail marketing platforms, accounting and tax consultancy firms), with whom the Controller has entered into or will enter into a specific Data Processing Agreement pursuant to Article 28 GDPR, ensuring compliance with the provisions of the GDPR.

- **Institutional bodies and public authorities:** public entities, judicial, supervisory or regulatory authorities, in cases where disclosure is required or mandated by applicable law.

An updated list of the Data Processors appointed by the Controller is available upon written request sent to privacy@valmex.it.

8. Transfers of Personal Data Outside the EEA

The Controller informs you that Personal Data may be stored on servers or technological infrastructure located outside the European Economic Area (EEA). In such cases, the transfer takes place in strict compliance with the conditions set out in Articles 44 et seq. GDPR, through recourse to one of the following safeguards:

- **Adequacy decisions** issued by the European Commission, where applicable;
- **Standard Contractual Clauses (SCCs)** adopted by the European Commission pursuant to Implementing Decision 2021/914/EU;
- **Binding Corporate Rules (BCRs)** for intra-group transfers, where applicable .

Data subjects may request information regarding the safeguards adopted for individual transfers by contacting the DPO at dpo@valmex.it.

9. Security Measures

In accordance with Article 32 GDPR, the Controller implements appropriate technical and organisational measures to ensure a level of security commensurate with the risk, in order to guarantee the confidentiality, integrity and availability of the Personal Data processed. Such measures include, by way of example and without limitation:

- the adoption of **encryption systems** for automated processing and data transmission;
- the definition of **access control policies** and authentication credential management for system administrators, in compliance with the requirements established by the Italian Data Protection Authority (Garante, Provision of 27 November 2008);
- the implementation of **periodic review and update procedures** for security measures, in line with sector best practices and ISO/IEC 27001 standards;
- the establishment of **data breach management procedures**, designed to ensure compliance with the notification obligations set out in Articles 33 and 34 GDPR.

10. Rights of the Data Subject

As a data subject under the GDPR, you are entitled to exercise, at any time and at no cost, the following rights against the Controller:

- **Right of access** (Article 15 GDPR): to obtain confirmation as to whether or not Personal Data concerning you are being processed and, where that is the case, to obtain a copy thereof together with the related information.
- **Right to rectification** (Article 16 GDPR): to obtain the rectification of inaccurate data or the completion of incomplete data.
- **Right to erasure ("right to be forgotten")** (Article 17 GDPR): to obtain the deletion of your data where one of the conditions provided for by the provision is met.
- **Right to restriction of processing** (Article 18 GDPR): to obtain restriction of processing in the cases provided for by the provision.
- **Right to data portability** (Article 20 GDPR): to receive Personal Data concerning you in a structured, commonly used and machine-readable format, in the cases provided for by the provision, and to transmit them to another controller.
- **Right to object** (Article 21 GDPR): to object at any time to the processing of Personal Data concerning you based on legitimate interest (Purpose C) or for direct marketing purposes (Purpose D).
- **Right to withdraw consent** (Article 7(3) GDPR): to withdraw consent to processing for marketing purposes (Purpose D) at any time, without prejudice to the lawfulness of processing carried out on the basis of consent given prior to its withdrawal.
- **How to exercise your rights:** Requests may be submitted to the Controller in writing to the e-mail address **privacy@valmex.it** or, through the DPO, to **dpo@valmex.it**. The Controller undertakes to provide a response within **30 days** of receipt of the request, extendable by a further 60 days for particularly complex requests, subject to prior notification to the data subject.
- **Right to lodge a complaint:** Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the competent supervisory authority, identified, for Italy, as the **Garante per la Protezione dei Dati Personali** (Piazza Venezia no. 11, 00187 Rome – www.gpdp.it – garante@gpdp.it).

11. Mandatory or Optional Nature of Data Provision

The provision of Personal Data for **Purposes A and B** (contractual and legal) is **mandatory**: in the absence of such data, the Controller will be unable to establish or continue a commercial relationship with the data subject.

The provision of data for **Purpose C** (ethical requirements verification) is necessary within the framework of the commercial relationship, as it is

functional to compliance with the obligations arising from the corporate Code of Ethics.

The provision of data for **Purpose D** (marketing) is **optional**: any refusal to provide data or subsequent withdrawal of consent will in no way affect the execution of contractual and commercial obligations.

Data Controller
VALMEX S.p.A.

Summary Table of Processing Activities

Purpose	Legal Basis	Data Processed	Retention Period
A – Contract management	Art. 6(1)(b) GDPR	Identification, contact, commercial data	Duration of relationship + 10 years
B – Legal obligations	Art. 6(1)(c) GDPR	Identification, contact, fiscal data	10 years from termination
C – Ethical requirements	Art. 6(1)(f) GDPR	Identification, commercial data	Duration of relationship + dispute management
D – Marketing	Art. 6(1)(a) GDPR (consent)	Identification data, e-mail address	Max 24 months or until withdrawal

CONSENT FORMULA

☐ I declare that I have read and understood the Privacy Notice (available at the following link: <https://www.valmex.it/fiera/privacy>)

☐ I give ☐ I do not give my consent to the processing of my personal data in order to be contacted by VALMEX S.p.A.