

PERSONAL DATA PROCESSING POLICY

AUTOEST SPA with registered office in SAN GIOVANNI AL NATISONE (UD) VIA MADONNA DI STRADA No. 22 Tax Code/VAT no. 00309580314 (hereinafter, Controller), as data controller, informs you pursuant to art. 13 of Italian Legislative Decree of 30.06.2003 no. 196 (hereinafter, Privacy Code) and art. 13 of EU Regulation n. 2016/679 (hereinafter, GDPR) that your data will be processed in the following manner and for the following purposes:

1) Subject of Processing

The Controller processes personal data, identification data (such as name, surname, company name, address, telephone number, email address, bank and payment details) - (hereinafter, personal data or simply data) that you have communicated upon the stipulation of contracts for the products and services of the Controller.

2) Purpose of data processing

Your personal data is processed:

A) Without your express consent (Article 24, letters a), b), c) of the Privacy Code and art. 6, letters b), e) of the GDPR), for the following Service purposes:

- Stipulate contracts for the products and services of the Controller;
- Fulfil the pre-contractual, contractual and tax obligations deriving from current relations with you;
- Fulfil the obligations established by law, by a regulation, by community legislation or by an order of the Authority (for example in relation to money laundering);
- Exercise the Controller's rights, for example the right to defence in court;

B) Only with your specific and distinct consent (Articles 23 and 130 of the Privacy Code and art. 7 of the GDPR), for the following Marketing Purposes:

- Sending you emails, mail and/or text messages and/or telephone contacts, newsletters, commercial communications and/or advertising material on products or services offered by the Controller and surveying your degree of satisfaction on the quality of products and services;
- sending you emails, mail and/or sms and/or telephone contacts for commercial and/or promotional communications of third parties (for example, business partners, etc.)

Please note that if you are already a customer, we may send you commercial communications relating to services and products provided by the Controller that are similar to those you have already purchased, unless you indicate that you do not wish to receive such communications (see Article 130, paragraph 4 of the Privacy Code).

3) Processing methods

Your personal data is processed using the methods indicated in Article 4 of the Privacy Code and Article 4, no. 2 of the GDPR, and more precisely: collection, registration, organisation, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation, erasure and destruction. Your personal data is processed either on paper or electronically and/or automated using methods that guarantee security and confidentiality.

The Controller will process personal data in compliance with the principle of lawfulness, limitation and minimisation. The retention period of your data is established for a period of time not exceeding the achievement of the purposes for which it is collected and processed:

- for the execution of contractual purposes;
- in compliance with the mandatory time limits prescribed by tax legislation;
- for a period not exceeding the completion of the services provided
- and until an explicit request for deletion by the data subject.

4) Access to data

Your data may be rendered accessible for the purposes referred to in Article 2.A) and 2.B), both in Italy and abroad:

- To employees and/or collaborators of the Controller in their role as appointed persons;
- To third-party companies or other subjects (merely by way of example, professional firms, consultants, etc.) which carry out outsourcing activities on behalf of the Controller, in their role as external data processors.

5) Communication of data

Without the need for express consent (pursuant to Article 24, letters a), b), and d) of the Privacy Code and Article 6, letters b) and c) of the GDPR), the Controller may communicate your data for the purposes referred to in Article 2.A) to Judicial Authorities as well as to all other subjects to whom the communication is mandatory by law for the fulfilment of the aforementioned purposes. These subjects will process data in their role as independent data controllers.

Your personal information will not be disclosed.

6) Transfer of Data

Personal data is stored on servers located within the European Union. In any case, it shall be understood that, if necessary, the Controller reserves the right to relocate the servers, including out-

side the EU. In this case, the Controller guarantees that the transfer of data outside the EU will take place in accordance with applicable legal provisions, subject to the standard contractual clauses stipulated by the European Commission.

7) Nature of data provision and consequences of refusal

The provision of data for the purposes referred to in Article 2.A) is mandatory. In its absence, we cannot guarantee the services outlined in Article 2.A).

The provision of data for the purposes referred to in Article 2.B) is, instead, optional. You can therefore decide to not provide any data or to subsequently deny the possibility of processing data which had been provided earlier. In this case, you will not be able to receive newsletters, commercial communications and advertising material concerning the products and services offered by the Controller.

However, you will still be entitled to the services referred to in Article 2.A).

8) Rights of the data subject

In your role as a data subject, you are guaranteed the rights set out in Article 7 of the Privacy Code and Article 15 of the GDPR, specifically, the right to:

- i. Obtain confirmation of the existence of your personal data, even if not yet registered, and communication of the same in an intelligible form;

- ii. Obtain an indication of: a) the origin of the personal data; b) processing purposes and procedures; c) the logic applied if digitally processed; d) the identity of the data controller, data processors and the representative appointed under Article 5, paragraph 2 of the Privacy Code and Article 3, paragraph 1 of the GDPR; e) the subjects or categories of subjects to whom the personal data may be sent or who may come to know of it as the designated representative in Italian territory, managers or agents.;

- iii. Obtain: a) updating, rectification and, when deemed of interest, integration of the data; b) erase, convert to an anonymous form or block data that has been processed in violation of the law, including data that does not need to be retained for the purposes for which it was collected and processed; c) confirmation that the operations described in sections a) and b) were made known, including their content, to the parties to whom the data was communicated or transmitted, except in cases when it may not be possible to do so or when it necessitates a disproportionate effort compared to the protected right;

- iv. Oppose, in whole or in part: a) the processing of personal data concerning you, even if pertinent to the purpose of collection, for legitimate reasons; b) the processing of personal

data concerning you for the purpose of sending advertising material or for carrying out market research or commercial communication.

Where applicable, you also have the rights under articles 16 to 21 of the GDPR (Right to rectification, right to deletion (right to be forgotten), right to restriction of processing, right to data portability, right to object), as well as the right to lodge a complaint with a Supervisory Authority.

9) How to exercise your rights

You can exercise your rights at any time by sending:

- A registered, return-receipt letter to: AUTOEST SPA VIA MADONNA DI STRADA No. 22 33048 SAN GIOVANNI AL NATISONE (UD)

- A certified email to the address: amministrazione@pec.metalest.it specifying the subject of your request, the right that you intend to exercise and attaching a photocopy of an identity document certifying the legitimate request.

10) Controller

The Data Controller is:

AUTOEST SPA VIA MADONNA DI STRADA No. 22 33048 SAN GIOVANNI AL NATISONE (UD)

The Data Controller AUTOEST SPA.