Privacy Notice for the Processing of Customer Personal Data

Pursuant to Article 13 of EU Regulation 2016/679

We hereby inform you, pursuant to Article 13 of EU Regulation 2016/679, that, upon the establishment and management of the contractual relationship, Laminazione Sottile S.p.A. will process your personal data solely for the purposes of managing the relationship between the Parties, as outlined below:

Data Controller and Data Protection Officer

The Data Controller is Laminazione Sottile S.p.A., with registered office at Via Cannola al Trivio, 28 - 80141 Naples and operational headquarters at S.S. 87 Km 21,200 – 81020 S. Marco Evangelista (CE), Tax Code, VAT No. and Naples Company Register No.: 00289760639, certified email: info@pec.laminazionesottile.it, and privacy email: privacy@laminazionesottile.com.
The Data Protection Officer is AGILAE S.r.l., represented by legal representative Francesco Castagna, with registered office in Naples (NA), Via Seggio del Popolo, 22, e-mail: dpo@agilae.it..

Nature of the Data Processed

Personal identification and contact data, tax data, banking details, creditworthiness information, and contact details of the Client's internal representatives will be processed. The data may be collected directly from the Client or from legitimate sources, including public databases or third parties.

Purpose of the Processing

In order to establish and manage the contractual relationship, Laminazione Sottile S.p.A., as Data Controller, processes the personal data described above, which are lawfully collected directly from the Client. The personal data are processed for purposes related to the establishment, execution, and management of the contractual relationship with the Client, including administrative, tax, and accounting obligations, creditworthiness assessments and credit risk management, and for the protection of the Data Controller's rights in legal or extrajudicial proceedings.

Legal Basis for Processing and Nature of Data Provision

The legal basis for processing is the necessity to execute a contract to which the data subject is party (Art. 6(1)(b) GDPR), compliance with legal obligations (Art. 6(1)(c) GDPR), and, in certain cases and only for specific activities, the legitimate interest of the Controller (Art. 6(1)(f) GDPR) in performing checks and interventions to protect its interests and company assets.
Providing data is mandatory for all legal and/or contractual obligations related to the supply relationship. Any refusal to provide one or more required data or the subsequent revocation—whether in full or in part—may result in the objective impossibility to execute the contract and/or to properly perform all obligations related to the contractual relationship between Laminazione Sottile S.p.A. and the Client.
Providing additional data, which may be requested for related but non-contractual purposes, is optional and any refusal will not affect the establishment or continuation of the main relationship.

Data Retention Period

Your personal data will be processed for the duration of the contractual relationship and, thereafter, for no longer than 10 years to fulfill legal obligations and pursue the Data Controller's legitimate interests, unless longer retention is required by law. After this retention period, personal data will be permanently deleted or anonymized.

Processing Methods

Your data will be processed by authorized staff within Laminazione Sottile S.p.A. (pursuant to Art. 29 GDPR), lawfully, fairly, and with the utmost confidentiality, primarily using electronic and IT tools, and stored on digital, paper, or any other appropriate medium, in compliance with the minimum security measures as per Article 32 of the GDPR. Even after the contractual relationship has ended, all personal data will be retained as needed to fulfill legal obligations or to manage requirements arising from the conclusion of the contract.

Data Disclosure

For the purposes described above, your personal data may be disclosed to internal personnel working under the direct authority of the Data Controller and who are designated and instructed as Authorized Processors (Art. 29 GDPR). The data may also be disclosed to external parties designated in writing as Data Processors (Art. 28 GDPR) by the

Controller.
Specifically, the data may be disclosed solely for the purposes outlined above to:

- Employees and collaborators of the Controller for executing the contract and/or pre-contractual measures;
- Third-party companies appointed as Data Processors (e.g., consultants, IT service providers, debt collection companies);
- Other companies controlled by Laminazione Sottile S.p.A. for administrative and contractual management reasons;
- Public authorities and competent bodies, in compliance with legal obligations;
- Companies within the Laminazione Sottile group for administrative purposes;
- Insurance companies, financial institutions, and entities in charge of handling commercial information.

Transfer of Personal Data Outside the EU

Personal data will be processed within the European Union and stored on servers located within the EU. No data transfers to third countries are currently foreseen. Should such transfers occur, adequate safeguards will be adopted in accordance with Chapter V of the GDPR.

Data Subject Rights

Pursuant to Articles 15 to 22 of the GDPR, Laminazione Sottile S.p.A. informs you that you have the right to request access to your personal data, their rectification or erasure, restriction of processing, or to object to their processing where applicable, by sending an email to: privacy@laminazionesottile.com. You may also exercise your rights by writing to the Data Protection Officer at: dpo@agilae.it. Furthermore, if you believe that the processing of your data violates the provisions of the GDPR, you may lodge a complaint with the Data Protection Authority using the form and procedure available on the website www.garanteprivacy.it.