#### **PRIVACY POLICY**

# INFORMATION ON THE PROCESSING OF PERSONAL DATA - EU REGULATION 2016/679

#### www.gfmspa.com

#### **SCOPES OF THE PRIVACY POLICY**

This privacy policy contains important information on the personal data that will be collected when browsing this Website, it describes the methods according to which said data will be used and lastly, it explains the processing procedures of the data provided by the user.

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## **ACCEPTANCE**

By visiting the website or interacting with the Company, the user confirms to have read and understood this Privacy Policy and to accept that the Company collects, uses, files, transmits and discloses the personal data collected through this website, in compliance with this privacy policy. Should you not agree with the conditions set forth by this privacy policy, please refrain from browsing this website, or otherwise use this website or send personal data through it.

## 1. PROCESSING OF PERSONAL DATA

In this Privacy Policy, the term "Personal Data" refers to any information that allows the Company to identify the user or third subject of whom the user provides data. Personal data will be processed in compliance with the (EU) General Regulation on personal data protection 2016/679 "(EU) Regulation 2016/679" and, if applicable, with laws of the country in which it will be collected. The Company reserves the right to further process data, if set forth by law or during criminal investigations or proceedings or other types of procedures.

## 2. PERSONAL DATA COLLECTED

# A) Origin of data

The Company collects the user's personal data only if the latter voluntarily provides information, such as for example, when exchanging emails between the Company and the user. Should the user provide third party's personal data to the Company (e.g. other customers or potential customers), this shall make sure that said third subjects have been informed and authorised to use their data, as set forth by this Privacy policy.

# B) Types of data

The Company can collect and use personal data according to the specific scope pursued and described below:

contact information such as address, email, telephone number, mobile number, country of origin, potential fax number and other contact information that applicable laws allow collecting.

## 3. PERSONAL DATA PROCESSING SCOPES

The data is conferred by the user voluntarily or collected when the latter requests a specific service, for example to handle claims, request information, contact request potentially sent by the user, that is, personal, contact information and data strictly required to respond to the request. The user shall provide his/her personal data for the afore-cited scopes as a potential refusal would prevent completing the request. Unless otherwise requested in order to comply with applicable local laws, data processing for said scopes may be executed without requesting the user's content, as necessary to fulfil the request.

#### 4. DISCLOSURE OF PERSONAL DATA

The Company does not share personal data with third companies, except for data processors, as mentioned below.

# A) Disclosure of personal data to data processors

The user's personal data may be shared with third subjects to monitor and analyse the website activity, host website contents, render technical and organisational services in order to attain the abovementioned scopes. These third subjects may access the user's personal data or store it or process it, to render said services on behalf of the Company. The Company's service suppliers are not authorised to use personal data for scopes other than providing the awarded services.

# B) Diffusion of personal data

The Company can disclose the user's personal data to third parties (i) if set forth by a law of the EU or Member State; (ii) in case of legal proceedings; (iii) to reply to a legitimate request from the police; or (iv) to protect the rights, personal data, security and assets of the Company or the public.

Moreover, as set forth by law, the Company can disclose the personal data to third parties in case of claims concerning the use of the website, if deemed necessary to investigate, prevent or adopt measures against illicit activities, alleged frauds or in case the Company, at its exclusive discretion, deems that the use of the website by the user is not compatible with the website terms.

The complete list of appointed data processors and third subjects to whom data is notified, can be obtained by sending a request at the following contact addresses (point 10).

# 5. PERSONAL DATA PROCESSING METHODS

The personal data collected through this website is mainly processed using electronic tools, and also paper supports.

## 6. SECURITY AND PRIVACY OF PERSONAL DATA

The Company has implemented suitable measures to protect the user's personal data from accidental loss and from non-authorised accesses, use, editing and disclosure. A firewall technology and other technological security measures based on procedures are used in the management of this website. Despite the Company has implemented the afore-cited security measures for the website, the user shall be aware that it is impossible to guarantee 100% security. Therefore, the user confers his/her personal data at his/her own risk and, to the extent allowed by applicable laws, the Company shall not be deemed liable for disclosure due to errors, omissions or non-authorised third party's actions during or after data transmission. The Company recommends the user to (i) update the software that protects data transmission on networks on a regular basis (e.g. antivirus software) and make sure that the supplier of the electronic communication services has adopted suitable measures to ensure data transmission security on networks (e.g. firewall and anti-spam filters). In the unlikely event in which the Company deems that the security of the user's personal data held or controlled by the same has been or may be compromised, this will inform the user according to the modalities set forth by applicable laws, using the foreseen procedures (by providing his/her email address to the Company, the user agrees to receive said communications in electronic format through said email address).

# 7. RIGHTS TO ACCESS PERSONAL DATA – USER'S RIGHTS

The user can access his/her data at any time and free of charge, receive his/her electronic personal data in a structured and commonly used format and transmit it to another Data Controller (data transferability), as well as correct, update, edit or delete it (granted applicable exceptions). The user can update the data conferred to the Company, by contacting the latter at the address indicated below. Data deletion requests are bound to applicable laws and obligations to store documents which the Company shall abide to. Should the user deem that there is an issue in the handling procedures of his/her personal data, he/she will have the right to bring forward a claim before the national Data Protection Authority or the Authority of any EU country or European Economic Area.

In exercising said rights, the user can send a request to the Company, by sending an email at <a href="mailto:info@gfmspa.com">info@gfmspa.com</a> or letter through regular mail at the address indicated below (point 10). When contacting the Company, the user shall include his/her name, email, mailing address and/or telephone number in order for the latter to promptly handle his/her request.

#### 8. DATA STORAGE TIMES

The personal data will be stored for the duration of the business relation, if established, and for the time required to attain the scope of this privacy policy. After said period, the user's personal data will be stored exclusively to comply with laws and regulations (e.g. for 10 years, for accounting scopes; for the mandatory storage time, in case of tax scopes; etc) or to allow the Company to keep evidence of rights and obligations.

#### 9. COOKIE POLICY

See the specific cookie policy available on this site www.gfmspa.com

# 10. DATA CONTROLLER – COMPANY'S CONTACT INFORMATION

For purposes of this Privacy policy and data processing described herein, it is specified that the term "Company" refers to GFM SPA with legal office in Via G. NATTA 5, 24030 MAPELLO (BG), Italy. The Company

is the Data Controller (as defined in (EU) Regulation (UE) 2016/679) of the data collected through this website.

Please contact the Company for any comment or request on this Privacy Policy at <a href="mailto:privacy@gfmspa.com">privacy@gfmspa.com</a> or telephone number 035/4995401.

## 11. UPDATES OF THIS PRIVACY POLICY – COMMUNICATIONS

The Company, at its discretion, reserves the right to change, amend, add or delete parts of this Privacy policy at any time, publishing the reviewed version on this page of the website, and updating the date of the "Last change" indicated below. The user is responsible to view the Privacy policy on a regular basis to learn about any changes applied to it.

Date of last change: 25/05/2018