F.lli LUCCO BORLERA
HIGH PRESSURE DIE CASTING, MACHINING & ASSEMBLY

INFORMATIVA EX ARTT. 13 E 14
DEL REGOLAMENTO (UE) 679/2016 - GDPR
FORNITORI / CLIENTI

PREMISE

Pursuant to Articles 13 and 14 of Regulation (EU) No. 2016/679 (hereinafter "Regulation" or "GDPR") and any applicable legislation regarding the processing of Personal Data, this document describes the methods of Personal Data processing carried out by F.lli Lucco Borlera S.r.l. in its capacity as Data Controller.
We inform you that the processing will be based on the principles of fairness, lawfulness, transparency, data minimization, accuracy, integrity, and the protection of your confidentiality and your rights.

RECIPIENTS

The recipients of this privacy notice are:

- **Suppliers** (natural persons);
- **Customers** (natural persons);
- **Contact personnel** of Suppliers and Customers (legal entities).

DATA CONTROLLER IDENTIFICATION DETAILS

The Data Controller is **F.lli Lucco Borlera S.r.l.**, with registered office at Corso IV Novembre 82, 10098 Rivoli (TO), Italy (hereinafter the "Data Controller" or the "Company").

DATA COLLECTION METHODS

Direct or indirect

DATA SOURCE

Customers, suppliers, or third parties, in so far as they are natural persons, are the "Data Subjects" and provide their data directly, both at the time the contractual relationship is established and subsequently during the course of the relationship formed with the Company. Furthermore, in certain cases, some data and information, including data relating to connected third parties, are collected from public records and databases that are publicly known and accessible to anyone.

CATEGORY OF DATA PROCESSED

Processing may include, by way of example but not limited to, the following categories of data: first name, surname, physical address, nationality, province and municipality of residence, landline and/or mobile telephone number, fax, tax

code, email address(es) and certified email address (PEC), IBAN and bank/postal details, tax code and VAT number of customers and suppliers (natural persons). Contact details (landline telephone, fax, mobile phone, email address) of contact personnel of customers/suppliers (legal entities).
The Data Subject is not required to provide "special categories of data", i.e., pursuant to the GDPR (Art. 9), personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data intended to uniquely identify a natural person, data concerning health, or data concerning a person's sex life or sexual orientation. In the event that the requested service or the contact established for commercial purposes should require the Company to process such data, the Data Subject will receive prior specific privacy notice and will be asked to grant explicit consent.

PURPOSE OF PROCESSING

The processing of the personal data provided is aimed at:

- Execution of the mandate received / performance of the contract;
- Compliance with legal obligations relating to the contractual relationship;
- Management of the contract, for example relations with agents, representatives, clients, and/or contractors;
- Any external professional collaborations aimed at carrying out the mandate;
- Protection of contractual rights;
- Internal statistical analysis for management and quality purposes;
- Sending informational material regarding the Company's business and products.

The legal basis for the processing of personal data is formed by the combined provisions of Art. 6(1)(b) performance of a contract to which the data subject is party; Art. 6(1)(c) compliance with a legal obligation to which the Data Controller is subject; and, where applicable, Art. 6(1)(f) legitimate interest of the Data Controller.

PROCESSING METHODS

The Data Controller adopts appropriate security measures to prevent unauthorized access, disclosure, modification, or destruction of personal data.
Processing will be carried out using automated and/or manual methods, in compliance with the aforementioned regulations, by personnel specifically authorized to process data. Processing may also be carried out by third parties providing specific processing, administrative, or instrumental services necessary to achieve the above-mentioned purposes.
All data processing operations will be carried out in such a way as to ensure the integrity, confidentiality, and availability of personal data.

SCOPE OF COMMUNICATION AND DISSEMINATION

The collected data will never be disseminated and will not be disclosed to third parties without your explicit consent, except for necessary communications that may involve the transfer of data to public bodies, consultants, or other entities in order to comply with legal obligations.

WHAT HAPPEN IF THE DATA SUBJECT DOES NOT PROVIDE THE IDENTIFICATION DATA REQUIRED TO CARRY OUT THE REQUESTES ASSIGNMENT (ART.13(2)(e)GDPR)

The collection and processing of personal data is necessary to carry out the requested services as well as for the provision of the requested Service and/or Product. Should the Data Subject fail to provide the personal data expressly marked as necessary within the specific form, the Data Controller will be unable to proceed with the processing activities related to the management of the requested services and/or contract and the Services/Products connected thereto, nor with the obligations arising from them.
In the event that the Data Subject has granted consent and subsequently decides to revoke it or object to processing for activities following the performance of the contract, their data will no longer be processed for such activities, without this entailing any negative consequences or prejudicial effects for the Data Subject or for the services already rendered.

DATA SORAGE

The Data Subject's personal data is stored in paper, IT, and/or electronic archives located at the operational premises of the Data Controller and in any other place where the parties involved in the processing are located.

RETENTION PERIOD

Unless the Data Subject explicitly requests their removal, the Data Subject's personal data will be retained for as long as necessary with respect to the legitimate purposes for which it was collected. In particular, it will be retained for the entire duration of their registration. Regardless of any request by the Data Subject for their removal, personal data will in any case be retained in accordance with the terms provided for by applicable national and European Union legislation and/or regulations, for the sole purpose of ensuring specific mandatory compliance.
Furthermore, personal data will in any case be retained for the fulfillment of obligations (e.g., tax and accounting obligations) that persist even after the termination of the contract; for these purposes, the Data Controller will retain only the data necessary to pursue them. Without prejudice to the above regarding compliance with legal obligations, personal data will not be retained for more than five years from its last use in the case of personal data of customers and/or suppliers, and for no more than ten years from the termination of collaboration with reference to workers/collaborators.

FURTHER INFORMATION

The Data Controller processes personal data relating to the Data Subject if one of the following legal bases applies:

- The processing is necessary for the performance of a contract with the Data Subject and/or for the execution of pre-contractual measures;
- The processing is necessary for compliance with a legal obligation to which the Data Controller is subject;
- The processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third party.

It is always possible to request the Data Controller to clarify the specific legal basis that applies to each processing operation, and in particular to specify whether the processing is derived from a legal requirement, is necessary to conclude and/or perform a contract, or is authorized based on consent granted by the Data Subject.

RIGHTS

At any time, pursuant to Article 7 of Legislative Decree 196/2003 and Articles 15 to 22 of GDPR 2016/679, you may exercise the right to:

Request confirmation as to whether or not personal data concerning you exists;
Obtain information regarding the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data has been or will be disclosed, and, where possible, the retention period;
Obtain the rectification and erasure of data;
Obtain the restriction of processing;
Obtain data portability, i.e., receive the data from a data controller in a structured, commonly used, and machine-readable format, and transmit it to another data controller without hindrance;
Object to processing at any time, including processing for direct marketing purposes;
Object to automated decision-making relating to natural persons, including profiling;
Request from the data controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject, or to object to processing, as well as the right to data portability;
Withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal;
Lodge a complaint with a supervisory authority.

You may exercise your rights by sending a written request to **F.lli Lucco Borlera srl**, at the postal address of the registered office or to the email address **info@lucco.it**