Notice concerning the processing of Personal Data (Art. 13 of the GDPR) FOR CUSTOMERS (CONTRACT EXECUTION)

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter Regulation or GDPR), the company ARS TECH S.r.l., hereinafter "Controller", "Employer", "We", "Our", "Ours", as the data controller, provides you, as a Customer, with information regarding the processing of your personal data.

1. Identity and contact details of the Data Controller

The Data Controller is the company A.R.S. TECH S.R.L., located in Controguerra (TE), 6010 Via Vallecupa 25, tel. 0861/1828018, VAT number 02088620683, email privacy@ars-tech.com PEC <u>ars-tech@legalmail.it</u>.

2. Nature of the processed data

The data subject to processing relates to your internal contacts responsible for managing the business relationship with us (conclusion and execution of the contract) through paper and electronic correspondence, on-site visits, participation in events and fairs, information requests, etc. We also process common personal data (address, residence, date and place of birth, identity document, tax code, etc.) of your representatives, managers, and partners involved in managing the relationship between the parties in the execution of commercial and business relationships.

The processed personal data are common in nature, such as name, surname, address, fixed and mobile telephone number, email address, data concerning duties, roles, assignments, work experiences of your representatives (employees and collaborators involved in the commercial relationship). The processing of special categories of personal data is excluded.

3. Purposes of processing and legal bases

Personal data is processed for the following purposes:

A. contract execution and/or pre-contractual measures;

B. administrative and accounting obligations provided by law regarding the contractual relationship between the parties;

C. management of complaints and any legal disputes arising from the contract's execution;

D. account management and promotion of secure and reliable services on the www.ars-tech.com portal;

The legal basis for the processing referred to in letter A is the contract between the parties pursuant to Article 6.1.b of the Regulation. The legal basis for the processing referred to in letter B is the legal obligation pursuant to Article 6.1.c of the Regulation. The legal basis for the processing referred to in letters C-D is our legitimate interest pursuant to Article 6.1.f of the Regulation.

4. Mandatory or optional nature of data provision and consequences of refusal to provide

The provision of personal data for the purposes mentioned in the previous section 3 ("Purposes of Processing and Legal Bases") is necessary to implement pre-contractual/contractual measures between us and your company (or the Customer of Ars Tech S.r.l.) and to allow mutual fulfillment of the resulting obligations, as well as to allow us to fulfill legal obligations and/or pursue our legitimate interest in carrying out business activities. Therefore, your refusal to provide them makes it impossible to conclude pre-contractual/contractual measures between us and your company.

5. Recipients or categories of recipients of the data

Personal data is accessible, within the Departments involved in activities related to Customers (Administration & Finance, Technical & Commercial Management, IT, Prototyping, etc.), to our managers, employees, and collaborators specifically designated to perform specific tasks and/or functions as authorized/appointed, to external collaborators and our external service providers, designated data processors, to whom specific written instructions have been given, to the extent strictly necessary for the pursuit of the purposes referred to in section 3 ("Purposes of Processing and Legal Bases"). The processed data may, for example, be communicated to third parties for purposes such as:

- postal services or other couriers for mail delivery;
- transport companies for the shipment of goods;
- banks/financial institutions for the management of collections and payments;
- business consultants and freelance professionals collaborating with us (e.g., accountants, individuals responsible
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for auditing the balance sheet and administrative, tax, and contractual consultants);

- insurance companies;
- marketing and newsletter sending;
- public authorities to fulfill regulatory obligations.

The list of external data processors designated by us is available upon request from the data subject. For mere business needs, some personal Customer data may be communicated to companies belonging to our corporate Group, in accordance with Consideration no. 48 of the Regulation.

6. Data retention period

The processed personal data is kept for the time strictly necessary to achieve the purposes outlined in section 3 ("Purposes of Processing and Legal Bases"). In detail, the retention period of personal data processed for the purposes mentioned in section 3 letters A-B) is ten years from the conclusion of the contract. The retention period of personal data processed for the purposes mentioned in section 3 letters C-D-E corresponds to the statute of limitations for possible legal disputes related to the commercial relationship and/or the services subject to the contract.

7. Transfer of personal data to a Third Country

The processed personal data is stored at our headquarters and its servers (both located in Italy). The data will not be transferred outside the European Economic Area.

8. Processing methods

The personal data collected for the aforementioned purposes will be processed by specifically authorized personnel using automated or non-automated methods. The processing of personal data does not involve the existence of automated decision-making processes, including profiling. We adopt all appropriate security measures to prevent unauthorized access, disclosure, alteration, or destruction of your personal data.

9. Rights of the data subjects

The data subject, where applicable, has the right to exercise the following rights:

- receive confirmation of the existence of personal data and request access (Article 15 Regulation)
- rectify, modify, and/or correct personal data (Article 16 Regulation)
- request deletion, transformation into anonymous form, or blocking of data processed unlawfully (Article 17 Regulation)
- limitation of processing (Article 18 Regulation)
- receive notification in case of rectification, deletion, or limitation (Article 19 Regulation)
- receive a copy of the data and request transmission to another data controller (Article 20 Regulation)

To exercise one or more of the rights listed above, you can send us a specific request by post or email, following the methods indicated on the website of the Privacy Guarantor in the section "How to protect your rights" (www.garanteprivacy.it).

10. Right to object

According to Article 21 of the Regulation, you have the right to object at any time, for reasons related to your particular situation, to the processing of personal data based on Article 6, paragraph 1, letter f), including profiling.

11. Right to lodge a complaint

Data subjects who believe that the processing of their personal data is carried out in violation of the Regulation and the Code have the right to lodge a complaint with the Guarantor (Article 77 Regulation), or alternatively, to take appropriate legal action (Article 79 Regulation).

The Data Controller ARS TECH S.r.l.

Last update: May 2018

Any updates to this information document are available at the following www.ars-tech.com

