

## PRIVACY POLICY

### PRIVATE CUSTOMERS – AFTER-SALES SERVICES

GIESSEGI INDUSTRIA MOBILI S.p.a US wishes to inform you about the processing of your personal data.

This privacy policy is provided in accordance with the principles of transparency and fairness and in compliance with your rights, pursuant to EU Regulation 2016/679 on personal data protection (GDPR)

### DATA CONTROLLER

The Data Controller is GIESSEGI INDUSTRIA MOBILI S.p.a US, via Bramante, 39, Appignano (MC), established in the European Union, which can be contacted at the following: telephone +39 0733 400811, email [info@giessegi.it](mailto:info@giessegi.it).

### PRIVACY REPRESENTATIVE

GIESSEGI INDUSTRIA MOBILI S.p.a US has identified a privacy representative who can be contacted for information regarding personal data processing, the exercise of data subjects' rights, the security measures and policies adopted and the list of data processors who process personal data.

The privacy representative can be contacted at the address: [privacy@giessegi.it](mailto:privacy@giessegi.it)

### DATA ORIGIN

The data is acquired directly from you and is provided upon the establishment of any relationships or when any reciprocal requests are sent, whenever:

- your requests are managed and processed, including those made via the web, relating to our products, goods, services and activities
- other relationships are requested, established or continued that require the use or inclusion of your personal data

Some personal data may be acquired from other parties, including:

- IT data, including your email address or access logs to the web platforms used to manage the services
- information from our sales network (retailers, agents with whom you have had contact or to whom you have forwarded requests)

### CATEGORIES OF PERSONAL DATA

The processing concerns personal identification data, including personal details, first name, surname, postal address, email address, telephone number, tax ID code (if applicable) and/or other data specified in the various processing purposes.

As a general rule, personal data classified as "sensitive" data, i.e. data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, 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, are not processed.

If there are specific needs to collect and process sensitive data, we will inform you accordingly,

supplementing this privacy policy and obtaining your consent if this is a condition for initiating or continuing the data processing.

## PURPOSE AND LEGAL BASIS OF THE PROCESSING

### PROVISION OF AFTER-SALES SERVICES

We process your identification data for purposes related and/or connected to the provision and management of after-sales services, which include managing complaints, managing support services and managing replacements. Data is also processed in order to:

- fulfil contractual and fiscal obligations and the related ancillary services associated with these obligations, arising from existing relationships with you
- manage services provided through our website [www.giessegi.it](http://www.giessegi.it), which include the collection, storage and processing of data processed for the purposes of establishing the relationship, fulfilling requests and the related technical, operational and administrative management, as well as for sending communications needed to perform the same services
- send you product safety communications, including recalls, instructions and precautions regarding use

Your data may also be processed for purposes related to legal obligations to which our organisation may be subject, namely:

- fulfilling general obligations required by law, regulations and EU legislation or by orders issued by Authorities and other competent institutions
- following up on requests from the competent administrative or judicial Authorities and, more generally, from public bodies in compliance with legal formalities

As regards the aforementioned purposes, processing is necessary to fulfil legal obligations (Article 6(1)(c) of the GDPR) and those arising from a contract or to fulfil, prior to the conclusion of the contract, your specific requests (Article 6(1)(b) of the GDPR), which constitute the legal basis for the processing.

### SENDING COMMERCIAL COMMUNICATIONS

Only with your explicit consent (Article 6(1)(a) of the GDPR), your data may also be processed for further direct marketing and commercial promotion purposes:

- sending you commercial information and promoting and advertising new products, goods or services provided by us, via email, post, telephone and messaging services
- measuring the level of satisfaction with the quality of the services provided
- carrying out market research, economic and statistical analyses
- sending you commercial and/or promotional communications from third parties (e.g. our commercial partners) via email, postal mail, telephone and messaging services

### LEGITIMATE INTEREST OF THE DATA CONTROLLER

Your personal data may be processed, without the need to seek your consent, for purposes related to the pursuit of our legitimate interests, including protection against fraud, risk assessments and related security measures, litigation management, data transfers within the organisation, statistical purposes, compliance with IT security obligations, including the adoption of procedures for detecting and notifying personal data breaches, as well as the processing necessary to ensure the exercise of the right to object.

For these purposes, your data will be processed based on the legitimate interest of the Data Controller (Article 6(1)(f) of the GDPR) according to the principles of fairness, proportionality, necessity and

minimisation, preferring, wherever possible, aggregate or anonymous data.

## PROCESSING METHODS

Processing is carried out using procedures and tools, including IT tools, suitable for ensuring the confidentiality, integrity, and availability of the data in the ways and within the limits necessary to achieve the aforementioned purposes and in compliance with the technical and organisational security measures adopted by our organisation.

Your personal data is processed exclusively by authorised and trained personnel, who are granted access to your personal data to the extent and within the limits required to perform the processing activities.

Data deemed excessive or irrelevant for the purposes of the processing will be deleted or not used except for the possible retention, in accordance with the law, of the deed or document containing it.

The transmission of data and information via email, internet or other digital channels not managed by GIESSEGI INDUSTRIA MOBILI S.p.a US cannot be considered totally secure: GIESSEGI INDUSTRIA MOBILI S.p.a US is therefore unable to guarantee the security of data transmitted via these channels. Therefore, any such transmission is at the sender's own risk.

## AUTOMATED DECISION-MAKING PROCESS AND PROFILING

No automated decision-making processes, including profiling, are used.

## DURATION OF PROCESSING

### PROVISION OF AFTER-SALES SERVICES

Data will be processed throughout the period of service provision. The data will also be processed subsequently to fulfil legal obligations and for administrative purposes, within the terms established by current legislation, such as: the required retention period for accounting, contractual documents and related communications, set at 10 years; periods under the statute of limitations starting from the termination of the relationship and in any case from the moment the rights arising therefrom can be exercised; additional terms established by any exemptions imposed by the Authorities (e.g. inspection requests, disputes and assessments) or arising from any litigation if this requires an extension of the retention period.

In the event of litigation, the data will be retained until the dispute is resolved, unless further retention obligations are established by law.

In any case, in order to protect its interests, GIESSEGI INDUSTRIA MOBILI S.p.a US may process your personal data for as long as permitted by law.

## CYBERSECURITY

IT data, including web service access logs and/or related IP addresses, may be retained based on any presumed and/or detected risk and any resulting detrimental consequences, with the exception of measures adopted to make the data anonymous or restrict its processing.

The data will be retained as from the detection of the dangerous event or data breach, for the time required to notify the Authority of the detected data breach and to adopt the relevant recovery and security measures.

## COMMERCIAL COMMUNICATIONS

For marketing and commercial promotion purposes, data will be retained until consent is withdrawn, after which GIESSEGI INDUSTRIA MOBILI S.p.a US will no longer make use of the user's personal data for such purposes, reserving the right to retain it for as long as necessary to protect its interests from potential complaints based on such processing.

Furthermore, on an annual basis, GIESSEGI INDUSTRIA MOBILI S.p.a US will verify the conditions for continuing users' subscription to the newsletter and will erase any addresses that are no longer valid or are inactive.

## OBLIGATION OR OPTION TO PROVIDE DATA

As regards the data we are required to know in order to fulfil our after-sales service, failure to provide it will make it impossible to provide the service, inasmuch as such data is necessary for its fulfilment.

## DATA RECIPIENTS

### LEVEL OF KNOWLEDGE WITHIN THE ORGANISATION

The following categories of individuals within our organisation may gain knowledge of your data: internal administrative and secretarial departments, accounting and invoicing staff, product and service marketing staff, employees and contract workers. All persons accessing your data are appropriately authorised, trained and bound by confidentiality obligations.

### EXTERNAL DISCLOSURE OF DATA

Your data will not be disseminated (for example, through online publication) unless we specifically request it and you have given your explicit consent.

Your data may be disclosed to:

- public or private entities that can access it pursuant to legal, regulatory or EU legislative provisions, within the limits set by such provisions
- our consultants, to the extent necessary to carry out their duties within our organisation, following a designation that imposes confidentiality and security obligations
- parties who process data for purposes ancillary to the relationship with us, or who perform or provide specific services strictly functional to the performance of that relationship (for example, printing letters and putting them into envelopes, shipping services, providers of electronic communication services or web services)
- companies, entities or associations, parent companies, subsidiaries, affiliates or companies subject to joint control, as well as among consortia, business networks and groupings and temporary associations of companies and with the entities belonging to them
- commercial information management companies or advertising and promotion companies;

The disclosure of your personal data is limited exclusively to the data necessary to achieve the specific purposes it is intended for.

## TRANSFER OF DATA OUTSIDE THE EU

As part of the fulfilment of the service, your personal data will not be transferred to third parties outside the European Union.

As part of the use of web services, some personal data may be transferred to recipients located outside the European Union, to third-party companies that provide services essential to the provision of our services,

such as digital service providers, for example.

In such cases, data processing is strictly bound to the purposes for which it was collected and shall be carried out in full compliance with the confidentiality and security standards set forth in applicable personal data protection laws.

In particular, whenever your personal data needs to be transferred abroad outside the EU, GIESSEGI INDUSTRIA MOBILI S.p.a US will take all appropriate and necessary measures, including contractual measures, to ensure an adequate level of protection of your personal data in accordance with the provisions of this privacy policy, or by basing the transfer on an adequacy decision or, alternatively, on the standard contractual clauses approved by the European Commission.

Further information on the transfer and the agreements that provide the legal basis can be found by contacting us using the contact details provided in this privacy policy.

## YOUR RIGHTS

At any time you may exercise the rights granted to you, pursuant to Articles 15 to 22 of EU Regulation 2016/679, namely:

1. request confirmation of whether or not any of your personal data is being or has been processed;
2. obtain information regarding the purposes of the processing, the categories of personal data processed, the recipients or categories of recipients to whom the personal data has been or will be disclosed, the data retention period or the criteria used to establish it;
3. update or rectify your personal data, so that it is always accurate;
4. erase personal data when no longer necessary for the purposes of the processing, if the legal conditions exist and the processing is not justified by any other legitimate reason;
5. restrict the processing of personal data, where the conditions exist, including inaccuracy, objection to the processing, or unlawful processing.
6. obtain data portability, if the processing is carried out on the basis of a contract and with automated tools, i.e. receive the data in a structured, commonly used and machine-readable format, also for the purpose of transmitting it to another data controller;
7. object to processing at any time, also in the case of processing for direct marketing purposes or carried out through automated decision-making processes, including profiling.
8. withdraw consent, if provided for specific processing activities. The withdrawal of consent does not affect the lawfulness of any processing based on consent performed prior to the withdrawal itself;
9. the right to lodge a complaint with a Supervisory Authority: without prejudice to any other administrative or judicial action; the complaint may be submitted to the Italian Data Protection Authority (in Italy [www.garanteprivacy.it](http://www.garanteprivacy.it), Tel. +39 06696771, email [urp@gpdp.it](mailto:urp@gpdp.it)). Or to the supervisory authorities established in another EU country, if the necessary conditions exist, such as you having a different residence or the violation of the law occurring in a different Member State.

To exercise these rights, you may contact the Data Controller, GIESSEGI INDUSTRIA MOBILI S.p.a US, with an informal request. The contact details are provided at the beginning of this privacy policy and GIESSEGI INDUSTRIA MOBILI S.p.a US will act accordingly and promptly.

If GIESSEGI INDUSTRIA MOBILI S.p.a US intends to process your data for purposes other than those set out in this privacy policy, it will inform you before doing so and, if necessary, obtain your consent.

## UPDATES

GIESSEGI INDUSTRIA MOBILI S.p.a US updates the internal policies and practices it has adopted for the protection of personal data whenever necessary and in the event of regulatory and organisational changes that have an impact on the processing of personal data.

Any updates to this privacy policy will be made available promptly and through appropriate means.