



PRIVACY POLICY WITHIN THE MEANING OF EU REGULATION No. 2016679

SIEL S.p.A., con sede in via 1° Maggio, n. 25, Trezzano Rosa (MI), CF e P.Iva 07163510154 (hereinafter "Holder"), as **OWNER OF TREATMENT**, informs you under art. 13 D.Lgs. 30.6.2003 n. 196 (hereinafter, "Privacy Code") and art. 13 EU Regulation n. 2016/679 (pursued, "GDPR") that your data will be processed in the manner and for the following purposes:

1. Object of treatment

The Data Controller processes personal, identifying and non-sensitive data (in particular, name, surname, tax code, VAT number, email address, telephone number - later, "personal data" or even "data") communicated by you contracting phase of supply conditions aimed at evaluating the contract for the sale of goods / services / processing of the Data Controller and / or when subscribing to the newsletter service offered by the Data Controller.

2. Finalization of the treatment

The personal data you provide will be used for the following purposes:

- a. comply with the legal requirements for which we are responsible for the administration, management and logistics of the product that wishes to purchase / work on behalf of third parties that has assigned us / the service for which it has requested the supply;
- b. carry out the required services, allow an effective management of relations with customers in order to respond to the requests for information, assistance, suggestions and / or specific needs you have indicated;
- c. send communications regarding the services offered, newsletters and personalized news, containing material and promotional initiatives of their activities and services (eg invitations to training courses, events, seminars, conferences, etc.) with traditional methods (telephone calls with operator) or automated (e-mail) Your personal data are processed: A) without your express consent (Article 6 letter b, and GDPR), with a view to contractual legitimacy.

3. Processing methods

The treatment will be carried out in an automated and / or manual way, with methods and tools, in compliance with the security measures referred to in art. 32 of the GDPR 2016/679, by persons specifically appointed, as expected by art. 29 GDPR 2016/679. Security measures will be used to ensure the confidentiality of the subject to which these data refer and to avoid undue access to third parties or unauthorized personnel. The Data Controller will process personal data for the time necessary to fulfill the above purposes, in compliance with the tax and civil law regulations, however, no later than 10 years from the establishment of the relationship for the Treatment Finality and no later than 2 years from the collection of data for the Marketing / Offerings Purposes on request.

4. Access to data

Data may be made accessible for the purposes referred to in art. 2.A): - to employees and collaborators of the owner or companies of the Group SIEL S.p.A. of which the Controller is a part, in their capacity as persons in charge and / or internal managers of the processing and / or system administrators; to Group companies SIEL S.p.A. of which the Owner is a part (for example, for support activities in the study of the customer's project feasibility, for technical project management activities, for the storage of personal data, etc.) or other subjects (for example, provider for management and maintenance of the website, suppliers,

lenders, professional offices, etc.) that carry out outsourcing activities on behalf of the Owner, in their capacity as external managers of the processing.

5. Data communication

Without your express consent (Article 6 letter b) and c) GDPR), the Data Controller may communicate your data for the purposes of the art. 2.A) to Supervisory Bodies, Judicial Authorities and to all the other subjects to whom the communication is obligatory by law for the accomplishment of said purposes. Your data will not be disclosed.

6. Data transfer

The management and storage of personal data will be carried out on servers located within the European Union of the Data Controller and / or third-party companies appointed and duly appointed as Data Processors. Currently the servers are located in Italy. The data will not be transferred to outside the European Union. In any case, the Data Controller remains the Data Controller, where necessary, to move the server location in Italy and / or European Union and / or non-EU countries. In this case, the Data Controller hereby ensures that the transfer of non-EU data will take place in accordance with the applicable legal provisions stipulating, if necessary, agreements that guarantee a level of adequate protection and / or adopting the standard contractual clauses provided by the European Commission.

7. Nature of the provision of data and consequences of refusal to reply

The provision of data for the purposes referred to in art. 2.A) is mandatory. In their absence, we cannot guarantee registration to the site or the services of the art. 2.A).

8. Rights of the interested party

In your capacity as an interested party, you have the rights set forth in art. 7 of the Privacy Code and art. 15 GDPR and precisely the rights of: i. obtain confirmation of the existence or not of personal data concerning you ii. obtain the indication:

- a) of the origin of personal data;
- b) of the purposes and methods of the processing;
- c) of the logic applied in the case of processing carried out with the aid of electronic instruments, d) of the identification details of the owner, of the managers; e) of the subjects or categories of subjects to whom the personal data may be communicated; iii. obtain: a) updating, rectification or, when interested, integration of data;
- b) cancellation, transformation into anonymous form or blocking of data processed in violation of the law. to object, in whole or in part: a) for legitimate reasons, to the processing of personal data concerning you, even though they are relevant to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending publicity material or direct sales or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by email and / or through traditional marketing methods by telephone and / or paper mail.



9. How to exercise the rights

You will be able to exercise your rights at any time by sending:

- a registered letter a.r. a SIEL S.p.A. established in via PRIMO MAGGIO n° 25, TREZZANO ROSA (MI), CF e P.Iva 07163510154
- an e-mail to the address PEC: sielspa@pec.sielups.com; info@sielups.com

10. Holder, manager and agents

The Data Controller is SIEL S.p.A. with registered office in Via BIANCA MARIA n° 23 – MILANO (MI) And operational headquarter in Via PRIMO MAGGIO n° 25 – TREZZANO ROSA (MI) The updated list of data processors and data processors is kept at the registered office of the Data Controller.

Receipt for the delivery and acknowledgment of the information

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I consent to the processing as provided at 2c