

Information on the processing of PERSONAL DATA

pursuant to the General Data Protection Regulation GDPR

for users of *The Spring of Data* service

The User acknowledges and accepts that the only valid and effective version of "Information on the processing of PERSONAL DATA" is the one in Italian, while the other versions provided in any other foreign language are made available as a courtesy only.

This Data Protection Policy explains the methods of collection and processing of your personal data, the purposes and legal bases of the processing, as well as the company policies adopted by PEDROLLO S.P.A. for data processing.

This Policy also indicates your rights regarding the processing and protection of personal data, but does not determine any rights or obligations for both parties in addition to those already provided for under applicable laws on the protection of personal data.

This Policy does not apply if you use a third-party site linked to the Service.

Data Controller

PEDROLLO S.P.A.

registered office: Via Enrico Fermi 7, San Bonifacio (37047 – VR) Italy

E-mail address: privacy@pedrollo.com

Purpose and legal basis of the processing

The data are processed in order to provide the requested service or for related, connected and instrumental activities to the same or because the processing serves the execution of pre-contractual measures requested by you (Article 6, § 1, letter b GDPR).

Type of data processed

For the purposes indicated above, the following categories of data are processed: personal and contact data (such as, by way of example, name and surname and other identification data, e-mail address, postal address, postal code, telephone number, mobile phone number, area code), characteristics of the requested product, language used, any of your contact preferences.

The Data Controller will not collect any personal data belonging to particular categories, unless this must be requested and necessary for the provision of the Service.

The Data Controller does not provide services to minors and, therefore, does not process the data of persons under the age of 18.

Mandatory provision

The provision of data is always optional, however the lack of consent could prevent access to certain features of the Service.

Data retention period

PEDROLLO S.P.A. processes your personal data in compliance with the principles set out in art. 5 GDPR and, in particular, in compliance with the principles of proportionality and limitation of conservation.

Therefore, your personal data will be kept for as long as they are necessary for the purposes for which they were originally collected. The data necessary to guarantee the assessment, exercise or defense of a right in court or out of court will also be kept for ten years and, in the event of

the effective establishment of an alternative judgment or procedure, for the duration of the same.

Communication and data transfer

The data are communicated to:

- **subjects who carry out, on behalf of PEDROLLO S.P.A., activities of a technical or organizational nature, or who carry out processing and processing services of data necessary for the use of the Service offered by the Data Controller.**

In addition, the data may be communicated to:

- professional firms and companies that provide assistance and consultancy services, including legal, as well as assistance for the management of complaints, pre-litigation, out-of-court and litigation procedures;

The subjects indicated above will operate as Data Processors, in compliance with the provisions of art. 28 GDPR, or of an independent Data Controller. The complete and constantly updated list can be requested from the Data Controller.

PEDROLLO S.P.A. guarantees that any internal personnel authorized to process data has been duly instructed on the regulations and procedures regarding the confidentiality of personal data.

It should be noted that the Data Controller may communicate your personal data to third parties in the following cases: (i) if required by law, by the judicial authority during civil, administrative or criminal legal proceedings, rules and / or regulations; (ii) at the request of public authorities; (iii) where disclosure is necessary to prevent physical injury and/or pecuniary loss and/or rights of defence; (iv) in connection with an investigation into suspicious illegal activities or (v) in the event that the Data Controller is subject to extraordinary transactions of a corporate nature.

Data may be transferred within the European Union and the United Kingdom. As for the transfer to the United Kingdom, it should be noted that it takes place on the basis of the adequacy decision of the European Commission and that, therefore, the data are subject to a level of protection appropriate to the standards of the GDPR.

Security measures

Taking the utmost consideration to the protection of personal data, PEDROLLO S.P.A. has implemented appropriate physical, technical and administrative security standards to protect your data from loss, misuse, modification or destruction. PEDROLLO S.P.A. protects your personal data from unauthorized access, use or disclosure, using security technologies and procedures.

In particular, PEDROLLO S.P.A. encrypts personal information using SSL (Secure Socket Layer) technology, if the personal information provided by the user to PEDROLLO S.P.A. must be communicated between servers installed via the Internet.

Rights of the interested party

In your capacity as Data Subject, you are the holder of a series of rights that you can exercise by contacting the Data Controller at the addresses indicated *below*.

If your request is received, PEDROLLO S.P.A. will make every reasonable effort to give a timely response or to inform you if additions are necessary.

Right of access (art. 15 GDPR): You have the right to know what data are being processed by the Data Controller. To check what personal data the Data Controller has about you, you can send a request to the Data Controller or access this information by consulting your account

Right of rectification (art. 16 GDPR): You have the right to ask the Data Controller to correct your personal data where these are inaccurate or out of date

Right to be forgotten (right to erasure, art. 17 GDPR): You have the right, under certain circumstances, to obtain the deletion of your personal data. The latter can be deleted if the reasons listed in art. 17 GDPR including: (i) the data are no longer necessary with respect to the purposes for which they were collected or otherwise processed; (ii) the consent on which the processing is based is revoked and there is no other legal basis for the processing; (iii) You object to the processing and there is no legitimate overriding reason to proceed with the processing of interest.

Right to restriction of processing (art. 18 GDPR): You have the right to restrict the processing of your personal data but only if:

- the accuracy of the data is contested, to allow the Data Controller to carry out the appropriate checks;
- the processing is unlawful, but you do not wish to erase the data; or
- the data are no longer necessary for the purposes for which they were collected, but their processing is still necessary to ascertain, exercise or defend a right in court; or
- has exercised the right to object and the verification of binding reasons is pending

Right to data portability (art. 20 GDPR): You have the right to data portability that requires the Data Controller to provide personal data to you or to another Data Processor in a structured format of common use and readable by automatic device, but only if the processing of such data is based on consent or the execution of a contract in which you are a party or if carried out by automated means.

Right to object to processing (art. 21 GDPR): You will have the right to object – at any time and on the basis of legitimate and relevant reasons – to the processing of your personal data and the Data Controller will no longer carry out any processing related to your personal data unless it is able to demonstrate that its legitimate reasons are overriding your rights and freedoms.

COMPLAINT: without prejudice to any other administrative or judicial action, you have the right to lodge a complaint with the Supervisory Authority. You can then contact the Guarantor for the protection of personal data via PEC at the protocollo@pec.gdpd.it address or by registered mail or by hand delivery to the Guarantor for the protection of personal data based in Rome (Italy) Piazza Venezia 11 – CAP 00186. For further information, see the institutional website of the Guarantor www.gdpd.it

Contacts

In case of questions, further information on privacy procedures and data management, or to exercise your rights, you can contact the Data Controller at the email address: privacy@pedrollo.com

Updates

This information is subject to periodic changes and updates. In order to facilitate the verification of any changes, the latest update is indicated at the bottom.

Last updated: May 2023