

**Information document pursuant to and for the purposes of Article 13, Regulation 2016/679 (EU)**

Acofer Prodotti Siderurgici S.p.a. wishes to inform you, pursuant to art. 13 of EU Regulation 2016/679 relating to the protection of personal data ("Regulation") and further national legislation of reference, on the purposes and methods of the processing of your data carried out on the occasion of the stipulation and execution of the contractual relationship.

**1. DATA CONTROLLER (articles 4 and 24 GDPR)**

The data controller is ACOFER PRODOTTI SIDERURGICI SPA, with registered office in Via Armando Diaz, 248 - 25010, San Zeno Naviglio (BS), in the person of the pro-tempore legal representative.

**2. DATA PROCESSED | PURPOSES OF THE PROCESSING | LAWFULNESS OF THE PROCESSING | DATA RETENTION PERIOD**

<i>Data processed</i>	<i>Purposes of the processing</i>	<i>Lawfulness of the processing</i>	<i>Data retention period</i>
The Data Controller will process all the data of its customers and suppliers necessary for the correct stipulation and execution of the contractual relationship, based on the different purposes they may be involved in.	Management of the contractual / commercial relationship [For example: fulfillment of specific requests of the customer / supplier before the conclusion of the contract; conclusion, modifications, execution of the contract; provision and management of related services; management of complaints, etc.].	Exercise and / or defense of rights in and out of court.	The data will be processed for the duration of the contractual relationship and, after its termination, until the limitation period of the rights mutually arising between the parties. In the case of a judicial dispute, for the entire duration of the same, and until the final decision is made.
	Administrative-accounting management [For example: invoicing; payment management; delays; missed payments; etc.]	The fulfillment of legal obligations relating to accounting and tax keeping.	
	Management of obligations for health and safety in the workplace.	The fulfillment of legal obligations to which the Data Controller is subject. The legitimate interest of the Data Controller in a more efficient and effective management of the discipline provided for by the legislation on health and safety.	
	Exercise and / or defense of rights in and out of court.	Legitimate interest of the Data Controller in the defense of their rights and in the exercise of their duties.	

**3. RECIPIENTS OR CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

The personal data provided will be communicated to recipients who will process the data as managers (Article 28 of the GDPR) and / or as natural persons acting under the authority of the Data Controller and the Manager (Article 29 of the GDPR), for the purposes listed above. In no case will the data be disseminated. The data may be disclosed to recipients belonging to the following categories: - Group companies; - professional firms and consultants in the field of assistance and consultancy relationships; - banks / credit institutions and similar; - companies responsible for managing the information system and communication networks; - competent authorities for the fulfillment of legal obligations and / or provisions of public bodies.

The subjects belonging to the aforementioned categories perform the function of data processing manager, or operate in total autonomy as separate data controllers. The list of any managers is constantly updated and available at the headquarters of the Data Controller.

**4. DATA TRANSFER TO A THIRD COUNTRY AND/OR TO INTERNATIONAL ORGANISATIONS**

The data provided is not, and will not be, transferred outside the European Union.

#### 5. NATURE OF DATA PROVISION AND REFUSAL

The provision of data is essential and mandatory to stipulate or correctly execute the contract or service. In the absence of the provision, the Data Controller will not be able to carry out the contract.

#### 6. DATA SUBJECT'S RIGHTS

You will be able to assert your rights as expressed by the articles. 15, 16, 17, 18, 19, 20, 21 of EU Regulation 2016/679, by contacting the Data Controller, by writing to the e-mail address [privacy@duferdotp.com](mailto:privacy@duferdotp.com).

You have the right, at any time, to ask the Data Controller for access to your personal data, rectification, limitation of processing. Furthermore, you have the right to object, at any time, to the processing of your data (including automated processing, eg profiling), as well as to the portability of your data.

We inform you that requests for deletion of data are subject to current legal obligations and the conservation of documents that are imposed on us by law or regulations.

Without prejudice to any other administrative and judicial appeal, if you believe that the processing of your data violates the provisions of EU Reg. 2016/679, pursuant to art. 15 letter f) of the aforementioned EU Reg. 2016/679, you have the right to lodge a complaint with the Guarantor for the protection of personal data - Italian Guarantor (<https://www.garanteprivacy.it/>).

#### 7. TREATMENT OF THIRD PARTY DATA

The customer / supplier is informed that, if he makes use of his employees or collaborators (including any subcontractors) in executing the contractual relationship, the personal data of the latter may be processed by the Data Controller, always in the capacity of data controller, for the aforementioned purposes, maintaining the same purposes, methods, retention times and rights provided. The customer / supplier has the duty to properly inform their employees and collaborators about the aforementioned treatments, including by delivering this information to them.

#### 8. UPDATE OF THE PRIVACY POLICY

The Data Controller may change, modify, add or remove any part of this privacy statement at any time, unless it is necessary to request consent, where required. In order to facilitate the verification of any changes, the information will contain an indication of the update date of the information itself.

Last update: April 14, 2021

#### ACOFER PRODOTTI SIDERURGICI S.p.A.

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Società a socio unico

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