

To whom it may concern,

Terry Store-Age S.p.A. (hereinafter "Organisation" or "Controller"), Controller of the processing of personal data, hereby provides the data protection policy pursuant to art. 13 of Regulation (EU) 2016/679 (hereinafter "GDPR"), to the data subjects (hereinafter the "Data Subjects").

The Organisation, as Controller, undertakes to protect the confidentiality and rights of the Data Subject and, pursuant to the principles dictated by the aforementioned regulations, the processing of the data provided will be based on the principles of correctness, lawfulness and transparency.

1. PURPOSE OF THE PROCESSING

The personal data provided by you, both in advance and in the course of the operations that have regulated the relationship between our Organisations, are collected and used within the limits established by law and regulations, for:

- a) the execution of legal obligations deriving from the contract for the supply of services or sale of material;
- b) to fulfil specific requests in relation to pre-contractual and contractual obligations;
- c) for the formation of lists of economic operators for the provision of work services;
- d) for administrative management: invoicing of accounts payable, management of orders and services;
- e) for the management of any in and out of court disputes;
- f) for the periodic management of communications to and from Credit, Financial and Insurance Institutions;
- g) to make payments: presentation of portfolios, bank transfers, issuing of credit notes;
- h) for the processing of statistics, management control, industrial accounting.

Data Subjects are also natural persons such as directors, employees and collaborators who operate on behalf of the supplier company. The personal data of the Data Subjects (personal data, telephone contact details and e-mail addresses) concern only those processed within the scope of the purposes described above.

Provision of data is optional, however, failure to provide the data and/or any express refusal to process the same will result in the impossibility for the Controller to follow up on the contractual relationship between the parties.

Data processing is lawful under art. 6 GDPR letters b) and c) as the processing is necessary for the execution of a contract to which the Data Subject is party or for the fulfilment of pre-contractual measures taken at the Data Subject's request; the processing is necessary to fulfil an obligation to which the Data Controller is subject.

As the purpose is part of the legal/economic management of the contractual relationship, the consent of the Data Subject is not necessary for the processing of the data.

2. PROCESSING METHODS

The data will be processed by manual, electronic, computerised tools, stored on computer, electronic and cloud supports, as well as on any other suitable support, in compliance with the security measures pursuant to (art. 32 GDPR). The processing of your data is carried out by means of the operations indicated in art. 4 n. 2) GDPR and, precisely: collection, recording, organisation, storage, consultation, processing, amendment, selection, extraction, comparison, use, interconnection, blocking, communication, erasure and destruction of data.

The Organisation adopts specific policies for the processing, storage and destruction of both computer and paper data and, in carrying out the processing activities, the Data Controller undertakes to:

- ensure the accuracy and updating of the data processed and promptly receive any corrections and/or additions requested by the Data Subject;
- adopt appropriate security measures to guarantee adequate data protection, in consideration of the potential impacts that the processing entails on the rights and fundamental freedoms of the Data Subject;
- notify the Data Subject, within the times and in the cases provided for by the mandatory legislation, of any breaches of personal data;
- ensure the compliance of the processing operations with the applicable provisions of the law.

3. COMMUNICATION AND DISSEMINATION OF DATA

Without prejudice to communications made in fulfilment of legal obligations, the Data Subject's personal data may be known not only by the Controller, but also by:

- employees and collaborators of the Controller as authorised Processors;
- administrative/accounting and business organisation consultants;
- authorities in general, administrations, bodies and public bodies;
- IT service providers.

The list or names of such contact persons are available at the registered office of the undersigned. In any case, it is forbidden to communicate or disseminate your personal data to persons not required for the fulfilment of the aforementioned purposes.

4. TRANSFERS ABROAD

Personal data will be stored and processed within the European Union, also on third-party cloud servers located within the European Union.

In the event of any processing of personal data outside the European Union, it will only take place after the adoption of adequate guarantees, as required by the mandatory legislation.

5. DATA STORAGE POLICY

The data are stored for the period necessary for the purposes for which they are processed or within the terms provided for by national and Community laws, rules and regulations to which the organisation must comply.

6. RIGHTS OF THE DATA SUBJECT

The Data Subject can assert their rights, recognised by the mandatory legislation and in particular by arts. 15 to 22 of the GDPR, such as:

- a) right of access: right to obtain confirmation from the Controller as to whether or not personal data are being processed and, if so, to obtain access to the personal data and to further information on the origin, purpose, categories of data processed, recipients of communication and/or transfer of the data, etc.;
- b) right of rectification: right to obtain from the Controller the rectification of inaccurate personal data without undue delay, as well as the completion of incomplete personal data, including by providing a supplementary declaration;
- c) right to erasure: right to obtain from the Controller the erasure of personal data without undue delay in the event that:
 - personal data are no longer necessary with respect to the purposes of the processing;
 - the consent on which the processing is based has been revoked and there is no other legal basis for the processing;
 - personal data have been unlawfully processed;
 - personal data must be erased to fulfil a legal obligation.
- d) right to object to processing: right to object at any time to the processing of personal data whose legal basis is a legitimate interest of the Controller;
- e) right to restriction of processing: right to obtain from the Controller restriction of processing, in cases where the accuracy of the personal data is contested (for a period enabling the Controller to verify the accuracy of the personal data), if the processing is unlawful and the Data Subject has objected to the processing, if the personal data are required by the Data Subject for the establishment, exercise or defence of legal claims, if following the objection to the processing the Data Subject is awaiting verification as to the prevalence or otherwise of the legitimate interest of the Controller;
- f) right to data portability: right to receive personal data in a structured, commonly used and machine-readable format and to transmit such data to another controller, only in cases where the processing is based on consent or on a contract and only for data processed by electronic means;
- g) right not to be subject to automated decisions: right to obtain from the Controller not to be subject to decisions based solely on automated processing, including profiling, which produce legal effects concerning the Data Subject or significantly affecting them, unless such decisions are necessary for the execution of a contract or are based on the consent given by the Data Subject;
- h) right to lodge a complaint with a supervisory authority: without prejudice to any other administrative or judicial appeal, the Data Subject who believes that the processing that regards them breaches the GDPR has the right to lodge a complaint with a supervisory authority.

In order to exercise the rights envisaged by the GDPR, the Data Subject may at any time exercise the rights by sending:

- via e-mail, to the following address: terry@legalmail.it
- by registered letter with acknowledgement of receipt to: Terry Store-Age S.p.A. – Viale De Gasperi 66 – 20008 Bareggio (MI)

7. CONTROLLER, PROCESSOR AND PERSONS IN CHARGE OF DATA PROCESSING

We hereby inform you that **the Controller** of the data you provide is:

Terry Store-Age S.p.A. - Via Rembrandt 27 – 20147 Milan (MI) Italian Tax Code and VAT number IT01624350151.

Your personal data will be processed exclusively by personnel appointed by the Controller or by its external suppliers appointed as processors. You can request a complete and up-to-date list of the persons appointed as Processors by contacting the Controller.

Terry Store-Age S.p.A. One-member company