

## INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF EU REGULATION 2016/679 ("GDPR")

Italvipla S.r.l., with registered office at Via Roma 92, 24064 Grumello del Monte (BG), VAT and Tax Code: 01054610165 (hereinafter the "Controller"), in its capacity as Data Controller, hereby informs you, pursuant to Article 13 of EU Regulation 2016/679 ("GDPR"), that your personal data and/or those of your delegates will be processed in accordance with the following terms:

### 1. Data Subject to Processing

The Controller processes personal data, understood as common identification and commercial contact data (name, surname, company name, tax code, company, VAT number, address, telephone contacts, email addresses, bank and payment details), relating to you or your delegates, provided during the negotiation and/or conclusion of contracts as Customers or Suppliers of the Controller, or collected during the contractual relationship.

The Customer or Supplier receiving this notice undertakes to inform their delegates whose data are subject to processing.

### 2. Purpose of Processing

Purposes related to the establishment and management of the commercial relationship and supply of products/services

Legal bases:

2.1.1 Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract;

2.1.2 Processing is necessary for compliance with a legal obligation to which the Controller is subject;

2.1.3 Processing is necessary for the purposes of the legitimate interests pursued by the Controller, including legal defense.

For Customers: purposes of commercial communication and promotion  
To send you (via email) communications regarding the Controller's products or services.

Legal bases:

2.2.1 Based on the Controller's legitimate interest (so-called "soft spam") if you have already purchased products or used services from us, and for similar products/services, unless you object;

2.2.2 Based on your explicit and specific consent or that of your delegates.

### 3. Processing Methods and Retention Period

Personal data may be processed by means of the operations referred to in Article 4(2) GDPR, both electronically and on paper, and will be protected by appropriate measures to ensure confidentiality and security.

The Controller will process personal data for the time necessary to fulfil the contractual purposes and in any case no longer than 10 years from the termination of the contractual relationship.

For commercial communication and promotion purposes, data will be processed for the time strictly necessary to achieve the purposes for which they were collected, for the period provided by law or by authority provisions. Upon withdrawal of consent or request to be removed from the marketing list, your data will be promptly deactivated from our marketing databases to prevent further communications.

In any case, personal data contained in previous communications will be retained for no longer than 24 months from their registration, unless anonymized.

### 4. Data Access and Disclosure

For the purposes set out in section 2, and to the extent necessary and relevant, the Controller may grant access to and/or disclose personal data to the following categories of recipients:

Employees or collaborators of the Controller, as authorized persons or processors, within the scope of their duties and in accordance with the law; Public or private entities, such as insurance companies, professionals, public bodies and administrations, acting as independent controllers or processors;

Service providers performing technical and organizational activities on behalf of the Controller, such as administrative, legal, accounting, tax or IT services, marketing agencies, and financial institutions.

Pursuant to Article 6(b) and (c) GDPR, without requiring explicit consent, the Controller may disclose personal data for contractual purposes to judicial authorities and other entities where disclosure is mandatory by law. These entities will process data as independent controllers.

Personal data will not be disseminated without explicit consent.

### 5. Data Transfers

Personal data may be transferred, for the purposes described herein and for storage needs, both within the European Union and to third countries. In any case, the Controller ensures that such transfers will be carried out in compliance with the appropriate safeguards pursuant to Articles 44 et seq. of the GDPR.

### 6. Nature of Data Provision

Providing data for the contractual purposes under section 2.1 is mandatory. Failure to provide such data will prevent the execution of the contractual relationship.

Providing data for commercial communication and promotion purposes under section 2.2 is optional. You may choose not to provide such data or withdraw consent at any time. In such cases, you will not receive commercial communications or promotional materials related to the Controller's products or services.

### 7. Data Subject Rights

Each data subject may exercise the rights provided under Article 15 GDPR, including:

Confirmation of the existence of personal data concerning them, even if not yet recorded, and communication of such data in an intelligible form;

Information on:

- a) the origin of the data;
- b) the purposes and methods of processing;
- c) the logic applied in case of electronic processing;
- d) the identification details of the Controller, processors, and designated representatives;
- e) the recipients or categories of recipients to whom the data may be disclosed;

Requests for:

- a) updating, rectification, or integration of data;
- b) erasure, anonymization, or blocking of data processed unlawfully;
- c) confirmation that such operations have been notified to third parties, unless impossible or disproportionate;

Objection, in whole or in part:

- a) for legitimate reasons, to the processing of personal data;
- b) to processing for direct marketing purposes, including automated and traditional methods (email, phone, mail). The data subject may choose to receive only traditional or only automated communications, or none at all.

Where applicable, the data subject also has the rights under Articles 16–21 GDPR (rectification, erasure, restriction, data portability, objection), and the right to lodge a complaint with the supervisory authority.

If applicable, the data subject has the right to compensation for any damage suffered, pursuant to Article 82 GDPR.

### 8. How to Exercise Your Rights

Data subjects may exercise their rights at any time by sending a registered letter to Italvipla S.r.l., Via Roma 92, 24064 Grumello del Monte (BG), or an email to [info@italvipla.com](mailto:info@italvipla.com).

### 9. Controller and Processors

The Data Controller is Italvipla S.r.l., with registered office at Via Roma 92, 24064 Grumello del Monte (BG), VAT and Tax Code: 01054610165.

The updated list of data processors is available at the Controller's registered office.