

PERSONAL DATA PROCESSING POLICY pursuant to articles 13 and 14 of Regulation (EU) 2016/679)

Data Controller. The Data Controller is FRASCOLD S.p.A. - Via Barbara Melzi 105 – 20027 Rescaldina (Mi), Tel. +39 0331 742201 - e-mail: frascold@frascold.it

Categories of Data Subjects and processed personal data The Data Controller may process personal data on the following subjects:

- (i) clients and potential clients who are natural persons;
- (ii) natural persons who act in the name and/or on behalf of business clients and potential business clients (such as a present legal representative, agents, representatives, etc); (hereinafter, all referred to as “**Data Subjects**” and individually as the “**Data Subject**”).

Depending on the interested parties, the treatments may concern the following common personal data: personal data, contact data, bank details and data necessary for the execution of the contractual relationship (for example: Name, Surname, Company name, Tax code/VAT number, e-mail, Telephone/fax/mobile number, Identification details of bank relationships such as IBAN, etc.) (hereinafter, the “**Personal Data**”).

Purposes and legal grounds for the processing. The Data Controller shall process Personal Data for the purposes and legal grounds as shown in the following table

Purposes of the processing	Legal grounds for the processing
Implementation of pre-contractual activities (preparation of estimates, providing information on the Services, etc.) – management and fulfilment of the contract and therefore of the consequent business relationship, provision of the Services (and related assistance), fulfilment of the related administrative, accounting and organisational/management obligations (including the development of new offers, the compilation of personal data lists, the management of orders, the performance of the Services and payments, the sending of service communications relating, for example, to the planning of the Services or to any changes and more generally to the related practical aspects, etc.)	to fulfil a contract or pre-contractual measures (Article 6(c) GDPR)
To send communications on similar products or services to those provided in the contract;	the legitimate interest of the Data Controller (Article 6(f) GDPR)
To comply with legal obligations (eg. tax provisions; obligations connected to accounting administrative activities)	to comply with a legal obligation (Article 6(c) GDPR)
To exercise or defend a right connected to the contractual relationship out of or in a court of law.	to exercise a right of the Data Controller/legitimate interest of the Data Controller (Article 6(f) GDPR)
To carry out communication and marketing activities (sending commercial and promotional communications)	Consent of the data subject (Article 6(f) GDPR)

Nature of the provision of data. Personal Data needs to be provided to fulfil the aforementioned purposes, therefore if this data is not provided - even partially - it shall not be possible to carry out the activities requested by Data Subjects, to establish a contractual relationship and to comply with any obligations connected to the operational, economic and administrative performance of

the Services. The data of the data subject could be obtained from a person other than the data subject following the authorisation of the data subject to transfer the data (e.g. marketing agencies or data brokers).

Personal data retention period. Personal data shall be stored for the period of time strictly required to fulfil the purposes for which it was collected. In accordance with legal obligations, it shall be stored for the period of time provided for by these legal obligations. The data processed on the basis of the consent of the data subject will be kept until such consent is revoked. Any data processed to exercise one of the Data Controller's rights shall be stored for the relevant limitation period conservatively increased by 6 months to guarantee the Data Controller's right of defence.

Recipients of personal data. For the aforementioned purposes and in accordance with the principles of necessity,

relevance and proportionality, people authorised to process data by the Data Controller (employees and partners) may come across Your Personal Data. Furthermore, the Data Controller might disclose it to:

- External subjects to fulfil legal obligations;
- Government administration and public and private bodies, including following inspections or checks;
- External subjects who work in the company process and which the Data Controller uses to carry out certain management phases as part of the company business carried out (tax, accounting, financial, insurance or legal obligations);
- Banks for handling receipts and payments.

Any processed data shall not be disclosed to additional third parties.

The updated list of potential External Data Processors is available by contacting the Data Controller.

Processing methods. Personal Data is processed both through automated or electronic processors and means and with manual methods and paper copies. All the means used for the processing are adequate to guarantee the security and confidentiality of the Personal Data and shall only be used by duly authorised and properly trained individuals.

Transferring data to Third Countries. Personal Data is not normally transferred to Third Countries. If it is necessary to fulfil the aforementioned purposes, Personal Data shall be transferred in accordance with existing legal provisions and with appropriate safeguards.

Data subject rights. If conditions are met, data subjects have the right to exercise the rights provided for by Articles 13 et seq of the GDPR. In particular, data subjects may request:

- Access to their Personal Data (and/or a copy of this Personal Data), as well as additional information on the current processing of this data;
- that their Personal Data is corrected or updated;
- that their Personal Data is deleted from any databases;
- that the processing of their Personal Data is restricted;
- Data portability, i.e. the right to obtain a copy of their Personal Data in a structured and commonly used format which is legible on an electronic device or to request that their data is sent to another Data Controller;

Data subjects also have the right: to object to the processing of their personal data; to withdraw their consent to processing at any time, where required; to file a complaint pursuant to Article 77 of the GDPR with the competent Authority.

Data Controller contact details. The Data Controller may be contacted by:

- E-Mail: frascold@frascold.it
- Ordinary post: - Via Barbara Melzi 105 – 20027 Rescaldina (Mi)

Policy updated on 01/10/2024