



GRILLO STEEL SRL CUSTOMERS PRIVACY POLICY article 13 EU regulation 2016/679

This document (hereinafter referred to as the "Notice") is provided in accordance with the rules on the protection of personal data and provides information on how the personal data of Grillo Steel srl's customers or potential customers are processed.

1. Controller of your personal data and address to contact us

The Controller of personal data is: Grillo Steel srl, with registered office in 36016 Thiene (VI) via della Statistica, n. 11, VAT 02949790242, legal representative Mrs Costaganna Mirella.

Grillo Steel srl collaborates with the company Lait srl, with registered office in 36016 Thiene (VI) via della Statistica, n. 9, VAT 03490640244, legal representative Mrs Costaganna Mirella, that is a joint controller of the processing of the personal data of the customers of Grillo Steel srl.

Grillo Steel srl manufactures and sells round, square and rectangular stainless steel pipes and special alloy in Italy and abroad.

If you have any questions regarding the processing of your personal data, or would like to exercise your rights or revoke your consent or object to processing based on legitimate interests, please contact us at the e-mail address privacy@grillosteel.it. In this Notice with the term "We" we refer to Grillo Steel srl.

2. Definition of "personal data" and "data-subject"

A "personal data" pursuant to article 4 paragraph 1 of EU Regulation 2016/679 is: *"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person"*.

"Data subject" is the natural person to whom the personal data refers. The Data subject is therefore the subject protected by the rules on the protection of personal data. In this Notice with the term "you" and "your data", We address the Data subject. The data of a legal person is therefore not personal data and is not subject to protection by our legal system.

We sell almost exclusively to companies (B2B sale) and rarely sell to individuals (B2C). We undertake to protect the personal data of the workers and/or collaborators of their legal entities customers, and We therefore invite all our customers to communicate this Notice to their workers and/or collaborators.

3. Method of collecting personal data: own or third-party data - Update personal data

We process personal data when the following situations occur:

- a) When We are contacted (e.g. via e-mail, via phone, via our website) in order to request information about our products and/or services (e.g. request for an offer);
- b) when We are contacted in reply to our marketing campaigns, for example by filling out a response sheet, or by entering data on our website;
- c) when your data is communicated to us by one of our distributors, or by an agent, or by a third party with the customer's consent;
- d) when you participate in events and/or fairs in which We participate or that We organize.

In the event that you communicate to us personal data of another person, before the communication, you must make sure that the that data-subject has inspected our Notice.

In the event that the data undergo changes, please inform us of the changes made (e.g. a modest e-mail address), so that We keep your personal information up to date.

If your data changes, please let us know which changes have been made (e.g. change to e-mail address) so that We may keep your personal data up-to-date.

4. Type of personal data collected

The type of personal data We process may be the following:

- a) Contact details: name, address, phone number, e-mail;
- b) Contract data (if the customer is a physical person): customer number, contract number, VAT;
- c) Information on the use of website: Information on how you use our website, including information collected via cookies and other tracking technologies;
- d) Information related to your purchases: information about your purchases including any complaints;
- e) Images: photos and/or videos taken at events and/or fairs that portray you.

5. Legal basis for the processing of personal data (Lawfulness of processing)



The processing of personal data in compliance with the EU regulation 2016/679 must be legitimated by a legitimate "legal basis" and We are obliged to indicate the legal basis for each treatment described in this statement. The legal basis recognized by the UE Regulation 2016/679 on the basis of the following legal bases:

- a) Consent: if you have consented to the use of your personal data with the release of consent which may be withdrawn at any time by sending an e-mail to privacy@grillosteel.it;
- b) Execution of pre-contractual measures or fulfilment of contractual obligations: your personal data is used to conclude a contract (e.g. sending an offer following a request), or to fulfill a contract (e.g. communication that the goods is ready for delivery);
- c) Statutory obligations: your personal data are used to comply with the law;
- d) Legitimate interest: your personal data is used: *i)* to pursue an our or third-party legitimate interest, unless your interests, rights or fundamental freedoms prevail; *ii)* if it is necessary to defend ourselves, to take legal action in case of claims made towards you, us or third parties.

6. Purpose of the processing of personal data

Personal data will be processed, for the purposes described below, by appropriate paper-based, electronic and/or telematic tools:

- a) to answer your requests: e.g. request for a quote, dispatch of order confirmation, dispatch of information material on products etc.. Grillo Steel SRL collects the contact data in order to respond to your requests, including by sharing, such information with Lait srl, and if necessary, with dealers and/or agents who may act as data controllers of the processing of personal data upon release of their own Notice.
Legal basis for treatment: execution of pre-contractual measures (see article 5 letter b);
- b) to provide support in sales management: Contacts during the execution of the sales contract.
Legal basis for treatment: Fulfilment of contractual obligations (see article 5 letter b);
- c) for legitimate interest (marketing activities so-called "soft spam"): to send informative and promotional communications similar to that of the sale by e-mail, pursuant to article 130 paragraph 4 of the Privacy code (Legislative Decree n. 196/2003) and in accordance with the Recital 47 of Reg. UE 2016/679 (see article 5 letter d);
- d) for legal obligations and protection in legal proceedings: in compliance with the legally binding requests of your personal data and legal protection of our right in order to comply with legal obligations, regulations or provisions of the judicial authority, as well as to defend a right in Court.

Where it is required, We will provide information that concerns you to the organisms responsible for the application of the law, regulations and judicial documents anywhere in the world. Furthermore We may process your personal data if We need to defend a right in Court.

Legal basis for processing: legal obligations, legitimate interest (see article 5 letter c and letter d).

It is our legitimate interest to protect and defend our rights. You may object to the processing of your data based on our legitimate interest, if the conditions are met.

7. Security measures taken to protect your personal data

We use technical and organizational measures to protect your data and our security measures are constantly updated on the basis of technological development. In particular, in our internal procedures, We take security measures such as:

- a) restriction of access to your personal data, as needed and for the sole purposes communicated in this Notice;
- b) the transfer of data electronically only in encrypted form;
- c) use of firewalls and antivirus to prohibit unauthorized access.

All your personal data is stored on our secure servers (or securely stored paper copies).

8. Retention of your personal data

Your personal data are kept only for the time necessary to achieve the purposes for which they were collected or for any other legitimate related purpose (for example, where they are relevant to a defence against claims made against us or in the presence of a legitimate interest). Therefore, if the personal data is processed for two different purposes, We will keep this data until the purpose with the longer term expires.

Your personal data that is no longer necessary, or for which there is no longer a legal requirement for its conservation, is irreversibly anonymised (and thus may be stored) or permanently deleted. To this end, personal data will be kept for the time necessary to achieve the purposes for which they were collected. For greater clarity, We report the retention periods related to the main purposes:

- a) Marketing purposes: personal data processed for marketing purposes may be stored for 10 (ten) years from the date on which We have obtained your last consent for that purpose (except in the case where you have



subsequently denied consent and with the exception of soft spam activity referred to in article 6 letter c of this Notice);

- b) Fulfilment of contractual obligations: the data processed to fulfil any contractual obligation with you, may be kept for the entire duration of the contract as well as for subsequent 10 (ten) years from the end of the fiscal year following that of competence, to face any investigation and/or a tax and/or legal dispute;
- c) In case of disputes: in the event that it is necessary to defend or act or even make claims against you or third parties, We may retain personal data that We will reasonably need to process for such purposes, for the time when such claim may be prosecuted.

9. Communication of your personal data and data transfer abroad

Your personal data may be accessed by our staff, and the staff of Lait Srl with whom We collaborate closely in the manufacture of products, sales dealers, agents and suppliers also located in countries outside the European Economic Area (EEA) for one of the purposes established in article 6 of the present Notice, whose data protection laws may be of a lower standard than the EEA. In that last case, We will make sure that all of your personal data accessible outside the EEA is processed with appropriate safeguards.

Countries outside the EEA might have been authorized by the European Commission as they provide protection similar to the EEA legislation on data protection, and therefore no additional legal safeguards are required. In the case of foreign countries which have not obtained such authorization, you will be asked to consent to the transfer, or your personal data will be transferred using the contractual clauses approved by the European Commission. These clauses impose similar obligations in the protection of data directly from the consignee, unless it is granted by applicable law regarding protection.

10. Your rights regarding the protection of personal data

Under current legislation, you have the right to ask us about your data:

- a) right of access;
- b) right to rectification and erasure (“right to be forgotten”);
- c) right to restriction of processing;
- d) right to data portability;
- e) acceptance of the withdrawal of consent, if the processing has its legal basis in consent as in marketing activity;
- f) to oppose any treatment based on legitimate interests unless the reasons for which We are obliged to perform such treatment overcome any prejudice to your data protection rights.

The exercise of these rights is subject to certain exceptions aimed at safeguarding the public interest (for example the prevention or identification of crimes) and our interests. In the event that you exercise any of the aforementioned rights, it will be our responsibility to verify that you are entitled to exercise them and We will give you a reply as a rule within a month.

In the event that you, if the conditions are met, withdraw your consent or exercise the right of erasure it will be necessary to consider that this operation will require a technical processing time that will be our best to minimize, but during which you could still be contacted due to the marketing activities already carried out.

If you are not satisfied with the way in which We process your personal data, or of our reply, you will have the right to complain to the supervisory authority, competent according to the article 77 of EU Regulation 2016/679 (in particular, in the Member State in which you usually reside, work or where the alleged violation has occurred).