

## CUSTOMER INFORMATION NOTICE

### INFORMATION NOTICE PURSUANT TO ARTICLE 13 OF EU REGULATION 2016/679

#### 1. Premise

For Sammontana S.p.A. Società Benefit your privacy and the safety of your personal data are particularly important. For this reason we collect and process your data with the utmost care and attention, taking appropriate organizational and technical measures.

Sammontana S.p.A. Società Benefit (as hereinafter referred to) provides this Information Notice to its Customers pursuant to EU Regulation 2016/679 on personal data protection (hereinafter the "Regulation")

#### 2. Data Controller

The Data Controller is Sammontana S.p.A. Società Benefit (hereinafter also referred to as "Sammontana"), with registered office at Empoli (FI), 50053, via Tosco Romagnola, n. 56, Tax Payer's Code and VAT number 03957900487; phone: 0571 7076, Fax: 0571 707447, E-mail: [privacy@sammontana.it](mailto:privacy@sammontana.it); certified mail: [sammontana@legalmail.it](mailto:sammontana@legalmail.it).

#### 3. Type of personal data processed

In accordance with this Information Notice, personal data shall refer to identifying and contact details, including but not limited to name, surname, address, telephone number, e-mail address (hereinafter jointly referred to as "Personal Data" or just "Data") of natural persons, which are processed by Sammontana (hereinafter referred to as "Data Subjects") to establish, perform and properly manage the contractual relationship entered into with its Customers (hereinafter referred to as the "Contract")

#### 4. Purposes of Data Processing and legal basis for processing

Sammontana processes the Data of the Data Subjects manually or via electronic means for the following purposes:

	<b>Purpose of data processing</b>	<b>Legal basis for data processing</b>
A	Fulfilment of the Contract between Sammontana and the Customer.	Data processing conducted for this purpose is necessary for the fulfillment of the Contract between Sammontana and the Customer. In this case no specific consent is required on the part of the data subject [Article 6, par. 1, letter b) of the Regulation].
B	Enabling Sammontana to exercise its rights also before a judicial court.	Data processing conducted for this purpose is necessary for the Data Controller to pursue its legitimate interest to establish, exercise or defend a right before a judicial court. In this case no specific consent is required on the part of the data subject [Article 6, paragraph 1, letter f) of the Regulation].
C	Complying with obligations arising out of applicable legislation including reporting requirements to competent Authorities and supervisory bodies and conforming to any requests made by the same.	Data processing conducted for this purpose is necessary to comply with a legal obligation to which the Data Controller is subject. In this case no specific consent is required on the part of the data subject [Article 6, paragraph 1, letter c) of the Regulation].
D	Sending of commercial messages regarding products and/or services similar to those covered by the Contract between Sammontana and the Customer (so-called <i>soft spam</i> ).	Data processing conducted for this purpose is necessary for the fulfillment of the Contract between Sammontana and the Customer as well as for the legitimate interests of the Data Controller to sell its products to the Customer.

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		In these cases no specific consent is required on the part of the data subject [Article 6, paragraph 1 letters b) and f) of the Regulation].
E	For the administration of post-sale satisfaction questionnaires.	Data processing conducted for this purpose is necessary for the legitimate interests of the Data Controller related to the Customer's after-sales satisfaction. In this case no specific consent is required on the part of the data subject [Article 6, paragraph 1 letters b) and f) of the Regulation].

### 5. Nature of Data provision and consequences of a refusal

The provision of Personal Data is necessary to achieve the above-mentioned purposes. Any refusal to provide these data, in whole or in part, may prevent the Contract from being executed or maintained.

### 6. Recipients/categories of Recipients of Personal Data

Your Personal Data will be processed by employees of Sammontana, duly authorised pursuant to Article 4, paragraph 1, n. 10) and 29 of the EU Regulation, acting according with the instructions provided by the Data Controller, exclusively with regard to the duties performed and for the purposes enumerated in section 4.

Your Personal Data may also be disclosed to service providers of Sammontana, acting as external Data Processors pursuant to Article 28 of the EU Regulation, hired by the same for the purpose of carrying out its activities and who provide sufficient guarantees of compliance with legislation on Personal Data processing.

These third parties may belong to any of the following categories: legal, administrative and tax advisors who assist Sammontana in the performance of its activities; external partners who perform specific tasks on behalf of the Company with regard to its corporate, accounting and fiscal obligations; financial and insurance operators; internet providers; suppliers of cloud or IT services; communication agencies; banking institutes entrusted with managing collections and payments deriving from the performance of the Contract; sub-suppliers/sub-contractors entrusted with activities in connection with the implementation of the Contract with the Data Controller; public bodies and/or judicial and/or supervisory Authorities upon their specific request. A detailed and updated list of these subjects is available at the Data Controller's headquarters and may be consulted at the request of the data subject.

Personal Data may also be disclosed to Public Bodies for the purpose of fulfilling obligations envisaged by law or regulations; entities whose right to access your Personal Data is granted by provisions of law or regulations (for example Guardia di Finanza (Italian financial inspectors), Police, local law enforcement Authorities, etc.) for the purpose of ascertaining and prosecuting unlawful conduct or for preventing and protecting from threats to public safety.

Your Personal Data may be disclosed to third parties also in the event of mergers, acquisitions, sales of a business or branch of business and other extraordinary transactions as well as to anyone who is legally entitled to receive notices by virtue of law or regulations. In keeping with the pursuance of the above-mentioned data processing purposes, your Personal Data may also be disclosed to other entities of the Group to which Sammontana belongs that, being established within the European Union, shall handle your Personal Data in accordance with the same Regulation.

Finally, your Data may be made available to judicial or administrative Authorities to allow Sammontana to exercise or protect its own rights or those of third parties or, in any case, for reasons related to the protection of the rights and freedoms of others.

In no circumstances will your Personal Data be circulated.

Should it be necessary to transfer your Personal Data to third countries or an international organization in order to pursue the purposes indicated above, the transfer of Personal Data will be carried out in compliance with the guarantees provided by Chapter V of the Regulation.

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### 7. Data Retention Period

We inform you that your Data will be kept for a limited period of time which will vary depending on the type and specific purpose of data processing, as specified in the following:

- Personal Data processed for the purpose of performing the Contract (section 4, letter A, above): data may be retained for a maximum period of 10 (ten) years after termination of the Contract;
- Personal Data processed for the purpose of handling any judicial and/or out-of-court disputes (section 4, letter B, above): data will be kept for the time strictly necessary to definitely resolve such disputes.
- Personal Data processed for the purpose of complying with the obligations envisaged by European and national laws (section 4, letter C, above): data will be kept for as long as provided for by applicable law;
- Personal Data processed for the purpose of sending marketing correspondence (so-called *soft spam* - section 4, letter D, above): data will be kept until a request is made to erase it or an objection is presented to its processing for the above-mentioned purpose;
- Personal Data processed for the purpose administration of post-sale satisfaction questionnaires (section 4, letter E, above): data will be kept until the creation of the Customer's after-sales satisfaction statistics.

Upon expiration of the retention period as above specified, your Data will be definitely erased or, in any case, permanently and irreversibly converted into an anonymous form so that they can no longer be traced back to the identity of the Data Subject.

### 8. Your Rights

We inform you that, as specifically provided for and guaranteed by the Regulation, you are entitled to the following rights in regard to your Personal Data as covered by this Information Notice:

- **Right of access and rectification** (Articles 15 and 16 of the Regulation): you are entitled to access your Personal Data and to request that they be rectified, modified or integrated. Upon request, we may provide you with a copy of your Data stored by us.
- **Right to erasure** (Article 17 of the Regulation): in the cases provided for by applicable legislation, you can request that your Personal Data be erased. Upon receiving and examining your request, we will interrupt further processing and delete your Personal Data in case that your request is based on legitimate grounds.
- **Right to restriction of processing** (Article 18 of the Regulation): you are entitled to request that processing of your Personal Data be restricted in case of verified inaccuracies or an unlawful processing of the same.
- **Right to Data portability** (Article 20 of the Regulation): you are entitled to obtain your Personal Data from the Data Controller in order to transmit them to another controller or have them forwarded to another controller in the cases provided for by the afore-mentioned article.
- **Right to object** (Article 21 of the Regulation): at any moment you are entitled to object to processing of your Personal Data on the basis of our legitimate interest by explaining the reasons that justify your request. Sammontana will abstain from further processing your Personal Data unless it demonstrates the existence of legitimate and compelling reasons for continuing the processing that prevail over your interests, rights and freedoms, or processing is necessary to ascertain, exercise or protect a legal claim.
- **Right to lodge a complaint** (Article 77 of the Regulation): without prejudice to any other administrative or non-judicial remedy, if you deem that the processing of your Personal Data contravenes applicable legislation, you have the right to lodge a complaint before the competent Authority for the Protection of Personal Data in the manner and pursuant to the terms set out on the website of the afore-mentioned Authority (*Garante per la protezione dei Dati Personali*) (<http://www.garanteprivacy.it>).

You are entitled to exercise your rights at any time, with reference to the specific processing of your Personal Data by Sammontana, by contacting the Controller at the addresses indicated in section 2, possibly using the forms reported on the website of the Autorità Garante per la protezione dei Dati Personali (Italian Data Protection Authority) (<https://www.garanteprivacy.it>).

For further information concerning your rights you can request the Controller to provide a full extract of the above-mentioned articles.



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### 9. Safety measures

Sammontana adopts adequate safety measures to safeguard the confidentiality, integrity, completeness and availability of your Personal Data. Technical, logistical and organizational measures are put in place to prevent damage, losses (including accidental ones), alterations, improper or unauthorized uses of the Personal Data processed.

### 10. Updates and amendments

Sammontana may modify, integrate or simply update, in whole or in part, this Information Notice issued in compliance with Article 13 of the Regulation also to reflect changes in regulations or following the coming into force of new regulations in its industry. Any such updates or amendments shall be notified to the Data Subjects.

Empoli, 02/04/2024

The Data Controller

SAMMONTANA S.P.A. Società Benefit

The Customer declares to have received, read and understood this Information Notice pursuant to Regulation 2016/679.

Signature

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