

**Privacy policy, updated in accordance with article 13 of Regulation (EU) 2016/679  
“GENERAL DATA PROTECTION REGULATION” (“GDPR”)  
and Legislative Decree 196/2003, supplemented by Legislative Decree 101/2018**

## **CUSTOMERS**

With this privacy policy, we wish to inform you of the modalities in which our Company, SIMIC S.p.A., processes your personal data, communicated to us by you as a Customer (or a representative of any of our Customers). This information is also available on our website: [www.simic.it](http://www.simic.it).

### **1) Data Controller**

The Data Controller is SIMIC S.p.A., located in Via Vittorio Veneto snc, in Camerana (CN - 12072) – VAT number: IT02121640045, in the person of Ferruccio Boveri, legal representative.

### **2) Data Protection Officer**

The Data Controller, not falling within the cases indicated by the article 37 of the GDPR, nor in those indicated in the various interpretations of the Guarantor Authority, did not deem it necessary to appoint a Data Protection Officer.

### **3) Subject of data processing**

The processing concerns personal data:

1. Identification data and contact details (e.g., name, surname, qualification, address, telephone number, e-mail, position in the Company), henceforth “personal data”, communicated by you during the preparation, conclusion or execution of supply and service contracts with the Data Controller.
2. Possibly data concerning aspects of financial reliability of administrators, as a complement to commercial information requested by the Company in the process of customer validation.
3. Possibly data, also belonging to special categories, conferred voluntarily in the context of debt collection activities.

### **4) Purpose of processing, legal basis, nature of the submission**

The purpose of the processing referred to in point 3.1 is to enable the execution of the contract concluded with the Data Controller. The treatment is lawful under article 6, paragraph 1) letter b) of the GDPR. The provision of data is mandatory, otherwise it will be impossible to properly manage the contractual aspects. The purpose of the processing referred to in point 3.2 is to protect the legitimate interests of the Data Controller (safeguarding of assets). The treatment is lawful under article 6, paragraph 1) letter f). The purpose of the processing referred to in point 3.3 is to protect the legitimate interests of the Data Controller (safeguarding of assets). The treatment is lawful under article 6, paragraph 1) letter f) and article 9, paragraph 2) letter e).

### **5) Methods of processing, duration of processing**

The processing of your personal data referred to in point 3.1 is carried out by means of the operations indicated in article 4, paragraph 2) of the GDPR, namely: collection, recording, organization, storage, consultation, use, blocking, disclosure, erasure and destruction. Your personal data is processed both in paper form and electronically and/or automatically.

All data provided by you that have fiscal/civil relevance will be kept in our archives for a period of 10 years, as required by current legislation. All data provided by you that is not relevant for tax purposes will be retained, unless otherwise indicated by you, until the conclusion of the contract for which it was provided.

The processing of personal data referred to in point 3.2, possibly collected for the purposes referred to in point 4, is carried out by means of the operations indicated in article 4, paragraph 2) of the GDPR and



precisely: collection, consultation, use, erasure and destruction. The processing is carried out in a lawful manner and any data collected does not exceed the requirements of corporate protection, with a view to balancing the interests of the Data Controller and the protection of data subjects, with special reference to what is indicated in article 10.

The processing of personal data referred to in point 3.3, possibly collected for the purposes referred to in point 4, is carried out by means of the operations indicated in article 4, paragraph 2) in the GDPR and specifically: collection, storage, organization, consultation, use, disclosure, erasure and destruction. The processing is carried out in a lawful manner and any data collected does not exceed the requirements of corporate protection, with a view to balancing the interests of the Data Controller and the protection of those concerned.

#### **6) Personal data access**

Your data may be made accessible for the purposes referred to in point 4) to employees and collaborators of the Data Controller, in their capacity as executors and/or internal data processors and/or system administrators.

#### **7) Personal data disclosure**

Without the need for express consent (formerly article 6 letters b), c) of the GDPR), the Data Controller may communicate your data for the purposes referred to in point 4) to supervisory bodies, judicial authorities, as well as to those persons to whom communication is required by law for the performance of these purposes. These subjects will process the data in their capacity as independent Data Controllers. Your data will not be disclosed.

#### **8) Data transfer to non-EU countries**

The personal data provided, as per point 3) are stored on servers or in paper files at the Data Controller's headquarters, at Camerana (CN), within the European Union. In any case, it is understood that the Data Controller, if necessary, will have the right to move the servers even outside the EU, for example in the case of the use of Cloud services. In this case, the Data Controller hereby guarantees that the transfer of data to non-EU countries will take place in accordance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided for by the European Commission.

#### **9) Rights of the data subject**

As an interested party, you have the rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR. In detail:

- Right of access
- Right of rectification
- Right to erasure ("right to be forgotten")
- Right of restriction of processing
- Right to notification obligation in the event of rectification or erasure of personal data or restriction of processing
- Right to data portability
- Right to object
- Rights relating to automated individual decision-making, including profiling

#### **10) Procedures for the exercise of the rights of the data subject**

You may at any time exercise your rights by sending:

- a registered letter with advice of receipt addressed to the Data Controller, as per point 1);
- an e-mail to [privacy@simic.it](mailto:privacy@simic.it).