



**PRIVACY POLICY FOR CUSTOMERS,
SUPPLIERS AND VISITORS**
("Privacy Policy")

Version:	001
Date:	June 2023
Prepared by:	Gianluca Passuti
Approved by	President of the Board of Directors

1. Data controller	O.M.P. Officine Mazzocco Pagnoni S.r.l. (the "Company"), whose contact information is listed on the Company website under the Contacts section and/or in the footer, is committed to protecting personal data in accordance with (a) Regulation (EU) 2016/679 ("GDPR") <i>on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC</i> as well as (b) Italian legislation on personal data protection ("National Data Protection Laws").
2. Authorized persons within the company involved in data processing	The persons within the Company, involved in data processing, have been authorized and duly instructed; these include members of security and of the Board of Statutory Auditors.
3. Data processors/recipients of the data	Data can be disclosed to third parties, that can act as independent or as joint data controllers, depending on the circumstances and based on agreements made with the Company. They belong to the following categories: <i>(i)</i> companies belonging to the same corporate group; <i>(ii)</i> providers of security services; <i>(iii)</i> persons in charge of the shipping/delivery of goods; <i>(iv)</i> providers of development, management, support and maintenance services for the IT infrastructure, with particular regard to software and web portals used to manage relationships with Suppliers; <i>(v)</i> providers of management software, apps, hardware and the corresponding support/maintenance services; <i>(vi)</i> providers of e-mail and connectivity services and the corresponding support/maintenance; <i>(vii)</i> legal and accounting advisors, auditing firms, environmental and occupational safety consultants, tax and quality advisors; <i>(viii)</i> industry associations and certifying bodies; <i>(ix)</i> credit and insurance institutions; <i>(x)</i> the supervisory body; <i>(xi)</i> public authorities and public bodies, even for purposes different from the ones the data was originally collected for. The Company provides specific information on data processors and recipients at the request of data subjects.



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4.	Data subjects	<p>1) Customers (including potential ones) – either natural persons or representatives of customer legal entities – that have business relations with the Company.</p> <p>2) Suppliers (including potential ones) – either natural persons or representatives of supplier legal entities – that have business relations with the Company; freelancers and consultants; representatives of contractors/subcontractors; personnel of the suppliers/contractors/subcontractors.</p> <p>3) Visitors who, for any reason, access company premises, regardless of whether they have been registered at the front desk or not and who may be granted access to the wi-fi, by signing the relevant form.</p>
5.	Personal data processed	<p>1) The personal data, that is processed, consists of common data, such as name and surname of the legal representative or the owner and/or of any representatives of the company, company name or registered name, tax code, VAT number, legal and tax domicile, full contact details, e.g. physical address and telephone number (including mobile number), fax number, certified email and regular email address, postal code and in general any information necessary to execute the contract, i.e. bank account details and/or data relating to the payment/collection system.</p> <p>2) In addition to the data listed above, the Company may process the following data, concerning the personnel of suppliers/contractors/subcontractors: (a) registration number, company/organization to which personnel belongs, salary, job title, seniority level, social security and insurance details, any other relevant data contained in payslips, documents attesting qualifications and the ability to perform certain activities; (b) specific categories of data, such as data contained in medical certificates attesting the eligibility to perform the work tasks required.</p> <p>3) With regard to the visitors that connect to the company wi-fi, the Company may process the IP address of the device used by the visitor.</p>



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6.	Purposes of data processing	<p>1) Customers' and suppliers' data shall be processed in order to establish contractual relationships or to implement pre-contractual measures at the request of the interested party, as well as to fulfil legal obligations.</p> <p>2) Data concerning the personnel of suppliers/contractors/subcontractors shall be processed in order to verify the possession of certifications testifying the subject's qualifications and their ability to perform certain work tasks, and also in order to protect the Company against any kind of liability.</p> <p>3) Customers' data may be processed for business purposes and/or for direct marketing purposes, i.e. for business communication and advertising.</p> <p>4) Unless customers object, data shall also be processed in order to share commercial information about Company's products, that are similar to the ones that have been previously purchased by the customer ("Opt-out").</p> <p>4) Data concerning visitors who connect to the company wi-fi shall be processed in order to enable the visitors' devices to access the internet, as well as for security purposes, and to protect the Company's assets and the Company in general.</p> <p>5) Common data from data subjects may also be processed for purposes of verification and surveillance in accordance with the Legislative Decree n.231/01 on the administrative responsibility of companies and entities.</p>
7.	Legal basis for the processing	<p>Data processing referred to in point 1) is necessary for the execution of a contract or to fulfil legal obligations.</p> <p>Data processing referred to in point 2) concerning the personnel of suppliers/contractors/subcontractors is carried out to fulfil legal obligations (on occupational safety) as well as to pursue the legitimate interest of the Company (regarding joint liability).</p> <p>Data processing referred to in point 3) is based on the consent of the data subjects, until its withdrawal.</p> <p>Data processing referred to in point 4) is based on legitimate interests.</p> <p>Data processing referred to in point 5) is based on legitimate interests.</p> <p>Data processing referred to in point 6) is based on legitimate interests.</p>



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8.	Data retention period	<p>Personal data of customers/suppliers and their representatives shall be kept for the entire duration of the contractual relationship and, for security purposes, shall be cancelled ten years and six months after the termination of the latter, unless an objection/dispute arises, in which case the data will be kept for the time necessary to exercise the right of defence and manage/resolve the dispute.</p> <p>Data referred to in point 2) of paragraph 5 (Personal data processed) and of paragraph 6 (Purposes of data processing) concerning the personnel of suppliers/contractors/subcontractors shall be cancelled three years after the termination of the contract, unless an objection/dispute arises, in which case the data will be kept for the time necessary to exercise the right of defence and manage/resolve the dispute.</p> <p>Data processed for commercial/marketing purposes referred to in point 3) of paragraph 6 (Purposes of data processing) shall be kept for 3 years after its collection or until data subjects withdraw their consent, unless consent to data processing is renewed or data is anonymised.</p> <p>Data processed for the purposes referred to in point 4) of paragraph 6 (Purposes of data processing) shall be kept until data subjects exercise their right to opt-out.</p> <p>Data processed for the purposes referred to in point 5) of paragraph 6 (Purposes of data processing) shall be kept for three years starting from the end of the month in which the subject connected to the company wi-fi. The IP address is processed for the entire duration of the connection to the company wi-fi.</p> <p>Data processed for the purposes referred to in point 6) of paragraph 6 (Purposes of data processing) shall be kept for the time necessary to process each piece of data, according to the time frame outlined for the data processing purposes mentioned above.</p>
9.	Optional/mandatory nature of the provision of data	<p>The provision of data, by data subjects, is necessary in order for the Company to fulfil its legal obligations as well as its contractual obligations, or to respond to pre-contractual requests. Any refusal from the data subject to provide, in whole or in part, their personal data will prevent the Company from responding to relevant requests, from executing the contract and/or from complying with legal obligations.</p>
10.	Data transfer abroad	<p>Personal data belonging to representatives of suppliers may be transferred outside the EU in order to run project development activities for the customers, when said customers are located outside the EU. The transfer, in any case, shall take place only once the compliance with the provisions listed in articles 44 and following of the GDPR has been verified and, in particular, only in accordance with GDPR provisions on non-EU countries and relevant safeguard mechanisms.</p>



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11. Rights	To exercise the rights provided for by the National Data Protection Laws and by the GDPR (articles 15 et seq.), data subjects may contact the Company or the Company's data processors, if any, in order to access their personal data, request its amendment, update, cancellation or the limitation of said data, as well as to request the portability of said data, by sending a request to the Company using the above-mentioned contact details.
12. Right to object	Using the same procedures described above, data subjects may object, in whole or in part, to the processing of their personal data, in case the relevant legal basis is constituted by the legitimate interest of the Company, pursuant to and in accordance with the provisions of Article 21 of the GDPR.
13. Complaint	Any data subject who believes that the processing of their personal data is in violation of the GDPR, in accordance with the provisions of article 77 of the GDPR, may lodge a complaint with a supervisory authority, where the data subject usually lives or works, or with a supervisory authority, where the alleged infringement has occurred.
14. Updates and amendments	The Company reserves the right to amend and/or update the Privacy Policy, taking into consideration any possible amendments and/or updates that may follow to national and/or EU legislation regarding the protection of personal data, or should any additional purposes for data processing arise. Newer versions of the Privacy Policy will replace the previous ones and will be valid, effective and applied starting from the date of publication on the Company website or from the date when the relevant data subjects have been notified.