

Data Privacy Policy

Customers & Suppliers - pursuant to Art. 13 GDPR

PRINOTH, as the data Controller (henceforth "**the Controller**"), informs you pursuant to Art. 13 of the European Union Regulation No. 2016/679 (henceforth "**GDPR**") that we are processing personal data concerning you for the following purposes:

1. Subject of processing

The Controller processes personal identity data (for example name, surname, company name, address, telephone number, e-mail, bank and payment details - henceforth "**personal data**" or simply "**data**") provided by you when defining the contract for the Controller's products or services.

2. Purpose of processing

Personal data concerning you are processed,

a) pursuant to Art. 6, chap. b) and c) of the GDPR, for the following purposes: implementation of the contractual agreement with you or execution of pre-contractual measures adopted on your request; fulfilment of pre-contractual, contractual and fiscal obligations deriving from the existing relationship with you; fulfilment of legal obligations, regulations, EC norms or orders from an authority (such as for example pursuant to the applicable anti-money-laundering rules); execution of the Controller's rights, for example the right of defence by judiciary;

We would like to inform you that we may send you commercial material relating to the Controller's products or services, similar to those already purchased by you from our company in a previous transaction, unless you have requested otherwise.

b) only if your explicit consent has been provided (GDPR Art. 7), for the following marketing purposes: send you e-mails, post and/or SMS and/or telephone calls, newsletters, marketing communication and/or advertising material on products or services offered by the Controller, as well as satisfaction surveys relating to the quality of products/services; send you e-mails, post and/or SMS and/or telephone calls, marketing and/or advertising communications from third parties (for example business partners, insurance companies).

3. Processing methods

The processing of your personal data is done by one of the methods indicated in Art. 4, point 2) of the GDPR, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data. Your personal data are processed both electronically or in hard copy, wholly or partly by automated means as well as other than by automated means.

The Controller will process personal data for the period required for the execution of the purposes detailed above, and in any case for no more than 10 years from the end of the relationship indicated in the purpose above, and for no longer than 3 years from the collection of the data for marketing purposes.

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4. Access to Data

Your personal data may be made accessible for the purposes detailed in Art. 2 to employees and collaborators of the Controller, authorized parties and/or internal representatives for processing and/or system administrators; to third party companies or other subjects (for example, credit brokers, professional studios, consultants, insurance companies providing insurance services, etc.) that carry out outsourcing activities on behalf of the Controller, in their role as external processing partners. In addition, other companies belonging to the HTI group to which the Controller belongs, may also have access to your personal data.

5. Communication of data

Without the requirement for explicit consent pursuant to Art. 6 par. b) and c) GDPR), the Controller may communicate personal data concerning you data for the purposes indicated above in Art. 29 to security organizations, judicial authorities, insurance companies providing insurance services, as well as subjects to which communication is required by law for the completion of the aforementioned purposes. These subjects will process the data autonomously as Data Controllers.

6. Transfer of data

The personal data are processed on in-house servers and servers of IT service partners located in the European Union. It should be noted however that the Controller, if it deems necessary, reserves the right to disclosed data outside of the European Union. In that case, the Controller shall ensure that the disclosure of data outside of the European Union will be in compliance with applicable legal requirements and subject to the adoption of the standard contractual clauses required by the European Commission.

7. Nature of data processing and consequences of refusal to reply

The processing of data for the purposes indicated in Art. 2 par. a) is absolutely required. Without it, execution of the contracts detailed in Art. 2 A is not possible).

The processing of data for the purposes lined out in Art. 2 b) is optional. You can decide to not provide any data for such data processing or withdraw your consent for data already provided at any later stage. In this case, you will not anymore receive any newsletters, commercial communications and advertising material relating to the Controller's products and services. Your rights on the products and services indicated in Art. 2 a). remain unchanged.

8. Data Subject's Rights

As data subject, you enjoy the rights pursuant to Art. 15ff of the GDPR, in particular the right to:

a) obtain a confirmation as to whether or not personal data concerning you are processed, regardless of their being already recorded, and get access to those data in an intelligible form;

b) obtain information on: (i) the source of the personal data; (ii) the purposes and methods of processing; (iii) the logic applied in the event of processing being carried out using electronic means; (iv) the identification details of the Controller, of managers and designated

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representatives as per Art. 3, paragraph 1 of the GDPR; (v) the recipients or categories of recipient to whom the personal data have been or will be disclosed as a designated representative in the State's territory, designated or authorized parties;

c) i) update, rectification or, where interested therein, integration of data;

ii) erasure, anonymization, blocking or restriction of data that have been processed unlawfully, including data whose retention has become unnecessary for the purposes for which they have been collected or subsequently processed;

iii) certification that the operations as per letters a) and b) have been implemented and notified to the entities to whom or which the data were disclosed, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;

iv) to object against the processing of personal data concerning you, in whole or in part, (a) on grounds related to your particular situation or; (b) where personal data are processed for direct marketing purposes such as sending of advertising material, direct selling or market research and commercial communication via e-mail and / or traditional methods via telephone and/or physical mail.

9. Ways of exercising your rights

You may, at any time, exercise your rights by sending:

- A letter by registered mail to the headquarters of the Controller;
- An e-mail to privacy@prinoth.com