

Customers and contact persons at customer companies:

## Privacy policy on the processing of personal data pursuant to arts. 13-14 EU Regulation 2016/679

### Data subjects: customers and/or contact persons at customer companies.

COEM S.p.A. in its capacity as Data Controller of your personal data, pursuant to and by the effects of EU Regulation 2016/679, hereinafter the 'GDPR', hereby informs you that the above-cited regulation provides for the protection of data subjects with respect to the processing of personal data and that said processing shall be characterised by the principles of correctness, lawfulness, transparency and the protection of your confidentiality and your rights.

Your personal data will be processed in compliance with the legislative provisions of the above-cited regulation and with the confidentiality obligations provided for therein.

The purposes and the legal basis of the processing: specifically, your data shall be processed for the following purposes connected with fulfilling legislative obligations:

- tax and accounting obligations required by law;
- obligations provided for by current laws;
- customer invoicing records.

Your data will also be used for the following purposes relating to the execution of measures connected with contractual or pre-contractual obligations:

- after-sales assistance;
- Customer Care;
- management of disputes;
- customer management;
- management of sales contracts and associated obligations, including pre-contractual activities.

Your data will also be used for the following purposes necessary for pursuing the data controller's legitimate interests:

- marketing via electronic mail, in relation to services or products similar to those already purchased by you and, also through the sending of newsletters or of invitations to events relating to said services or products. In addition, you can oppose said processing purposes upon the collection of the data or upon the sending of any subsequent communication, using the link at the foot of "Cancel / Unsubscribe" message or through the sending of a request to the Data Controller to the addresses indicated in this policy.

With regards to the above-indicated purposes in which you are an employee-contact person of the Agency-legal entity, your data will be processed as a result of the need to interact with the Agency-legal entity through you.

Methods of processing. Your personal data may be processed in the following ways:

- by means of electronic calculators using computing devices managed by Third Parties;
- assignment of analysis operations to third parties;
- ALSO THROUGH THEIR INCLUSION IN THE DATA CONTROLLER'S COMPANY CRM;
- the Data Controller uses systems for the sending of newsletters and promotional communications with reports. Thanks to the reports, the Data Controller will be able to find out, for example: the number of readers, of openings, of unique "clickers" and clicks; the date/time/minute of the e-mails sent; details of the emails delivered and not, of those forwarded; the list of unsubscribers from the newsletter; those who have opened an e-mail or clicked on a single link; link tracking (that is, the number of clicks on the message links);

click tracking (which links have been clicked and by who). All these data are used for the purpose of comparing, and possibly improving the results of the communications;

- processing by means of electronic devices;
- manual processing using paper records.

Every processing activity occurs in compliance with the procedure pursuant to arts. 6 and 32 of the GDPR and through the adoption of appropriate prescribed security measures.

Your data will be processed only by staff expressly authorised by the Data Controller and, specifically, by the following groups of staff:

- General Management;
- Corporate Officers;
- Administration Office;
- Sales Office;
- Marketing Office.

Communication: Your data may be communicated to external individuals and legal entities for a correct management of the relationship and specifically in the following categories of Recipients operating in their capacity as External Data Processor or Autonomous Data Controller:

- Agents and/or Representatives;
- banks and credit institutes;
- consultants and freelance workers, also operating as a partnership;
- in the context of public and/or private individuals or entities for which the communication of the data is mandatory or necessary in fulfilment of legal obligations or, in any case useful for managing the relationship;
- external supplier for the forwarding of commercial information;
- external suppliers necessary for the performance of the relationship in force (e.g., companies that provide hardware or software or cloud services);
- constitutional bodies or bodies of constitutional significance;
- shippers, transporters, own drivers, Postal service, Logistics companies.

Dissemination: Your personal data will not be disseminated in any way.

Your personal data may also be transferred, within the limits of the above-described purposes, to the following states:

- for technical and/or organisational requirements, to member states of the European Union.

Period of Storage. We hereby inform you that, in compliance with the principles of lawfulness, limitation of purposes and the minimisation of data, pursuant to art. 5 of the GDPR, the period of storage of your data is:

- established as for a period of time not exceeding the achievement of the purposes for which the data have been collected and processed for the completion of the contractual purposes;
- established for a period of time not exceeding the achievement of the purposes for which the data have been collected and processed and in compliance with the obligatory timeframes prescribed by law;
- for marketing purposes, established for a period of time necessary for the carrying out of the services provided until when you decide to cancel your subscription.

Data Controller: in accordance with the law, the Data Controller is COEM S.p.A. (Via Cameazzo 25, 41042 Fiorano Modenese (MO); VAT no.: 01927780369; contactable at the following addresses: E-mail: [privacy.coem@coem.it](mailto:privacy.coem@coem.it); Telephone: 0536 993511) in the person of its pro-tempore legal representative.

You have the right to obtain from the data controller the erasure (right to be forgotten), limitation, updating, rectification, portability, opposition to the processing of personal data regarding you, as well as, in general, to exercise all the rights provided for by arts. 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR by writing to [privacy@coem.it](mailto:privacy@coem.it). You can also make a claim to the competent control body if you consider that the processing of your data is contrary to current law.

You can also examine the updated version of this policy at any time, connecting to the internet address <https://www.privacylab.it/informativa.php?07369181916>.

## **Reg. EU 2016/679: Arts. 15, 16, 17, 18, 19, 20, 21 and 22 – Rights of the data subject**

1. The data subject has the right to obtain confirmation of the existence or not of personal data relating to them, also if not yet registered, their communication in legible form and the possibility of making a claim to the control Body (Italian Data Protection Agency).

2. The data subject has the right to obtain indication:

- a. of the origin of the personal data;
- b. of the purposes and methods of processing;
- c. of the logic applied in the event of processing carried out with the use of electronic instruments;
- d. of the general details of the data controller, of the data processors and of the designated representative pursuant to article 5, paragraph 2;
- e. of the individuals or legal entities or categories of individuals or legal entities to which personal data may be communicated or which they may gain knowledge of in their capacity as designated representative in the national territory, of data processors or persons in charge of processing.

3. The data subject has the right to obtain:

- a. the updating, rectification or, when of interest, integration of the data;
- b. the erasure, transformation into anonymous form or the blocking of data processed in breach of the law, including those for which storage is not necessary in relation to the purposes for which the data have been collected or subsequently processed;
- c. certification that the operations as per letters a) and b) have been brought to the attention, also with regards to their content, to those to which the data have been communicated or disclosed, with the exception of cases in which said fulfilment is impossible or involves a clearly disproportionate use of resources with respect to the protected right;
- d. the portability of the data.

4. The data subject has the right to oppose, in whole or in part:

- a. for legitimate reasons to the processing of personal data relating to them, although pertinent to the purpose of collection;
- b. to the processing of personal data that relate to them for the purpose of the sending of advertising material or of direct sales or for the carrying out of market research or commercial communications.