

## PRIVACY POLICY – CUSTOMERS

### Information notice pursuant to Article 13 of the REGULATION (EU) 2016/679 (GDPR) – Processing of personal data collected from data subject

Pursuant to Reg. UE 2016/679 (General Data Protection Regulation) we provide you the due information concerning processing of collected personal data in accordance to art. 13 GDPR.

**Data controller: SIG Società Italiana Gomma SpA** with registered address in Via Quintino Sella 4, 20121 - Milano and operational headquarters in Via Colombo, 144 – 21055 Gorla Minore (VA), represented by the Center Administrator – Legal Representative. Contact details of the Data Controller: e-mail [privacy@sig.it](mailto:privacy@sig.it).

**Personal data:** any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can directly or indirectly be identified, in particular by reference to an identifier such as a name, an identification number, a location data, an online identifier or to one or more specific factors to the physical, physiological, genetic, mental, economic, cultural or social identity (C26, C27, C30).

Personal data that will be processed for the mentioned purposes are:

-first name, last name, address, tax code related to natural person, threatened by company for contract conclusion and subsequent fulfilment, in person of the legal representative who enters into an agreement on behalf of, and for the customer, as well as employees/advisors' acting as handlers of him.

| PURPOSES OF PROCESSING  | LEGAL BASIS FOR THE PROCESSING  | DATA RETENTION  |
|---|---|---|
| Processing aimed at fulfilling contractual and precontractual obligations and for related administrative and accounting purposes.   | <i>Contract</i><br>art. 6 point (b) GDPR: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;<br><br><i>Legal Obligation</i><br>art. 6 point (c) GDPR: processing is necessary for compliance with a legal obligation to which the controller is subject to.   | 10 years or otherwise stated by law<br>Art. 2220 C.C. |
| SOFTSPAM: activities of commercial / promotional information, newsletters by e-mail to the e-mail address provided during the sale, concerning the same type of product and / or service (Soft Spam) similar to the product / service object of sale - art. 130, par. 4 of Italian privacy Code / legitimate interest (Article 6 point (f) EU Reg. 2016/679), unless opposed. | <i>Legitimate interest</i><br>art. 6 point (f) GDPR and Recital 47: processing is necessary for the purpose of the legitimate interest pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data considered the reasonable expectations given by the data subject based on his relationship with the controller | Until unsubscribe ( opt – out )                       |

### RECIPIENTS OR CATEGORIES OF RECIPIENTS

The personal data provided will be communicated to the employees or collaborators of the Data Controller who will process the data as persons in charge of the processing acting under the authority of the controller (art. 29 GDPR). Your personal data may be communicated to companies contractually involved with the Data Controller and in particular to third parties belonging to the following categories: entities that provide services for the management of the information system used by Data Controller and the telecommunication networks (including e-mail); - firms or companies which provide assistance and counselling; - insurance companies; - in case of Administrative and accounting purposes, data could be transmitted to business information companies evaluating solvency and payment habits and/or relating to debt collectioning; - competent authorities

who enforce the law and/or regulations promulgated by public bodies, upon request. The above mentioned subjects will act as Data Processor or may carry out their processing activities as independent Data Controllers. The list of appointed Data Processors is constantly updated and it is available at Data Controller's headquarters.

#### **DATA TRANSFER TO A THIRD COUNTRY AND/OR TO INTERNATIONAL ORGANISATIONS**

The personal data provided will not be transferred in countries outside the EU.

#### **PROVISION AND REFUSAL**

Personal data provision is necessary for the above mentioned purposes, in order to draw up the contract between parties and to purposes related to the management of administrative and accounting fulfillments. The refusal will prevent from giving effect to the contract. Soft Spam: the data subject has the right to oppose the processing of data at any time. The opposition even after these e-mail communications will not affect the contract.

#### **DATA SUBJECTS' RIGHTS**

You shall be able to exercise your rights under articles 15 et seq. of EU Regulation 2016/679 by sending an email to the Data Controller at the following address: [privacy@sig.it](mailto:privacy@sig.it). You shall have the right to obtain, at any moment, from the Data Controller, access to your personal data and their rectification or cancellation, as well as the restriction of their processing. Furthermore, you have the right to object, at any time, the processing of your data. In case of a request for data portability, the Data Controller shall provide your personal data to you in a structured, commonly used and machine-readable format. Without prejudice for any other administrative and jurisdictional recourse, if you believe that the processing of your personal data violates the provisions of EU Reg. 2016/679 you have the right, pursuant to art. 15 letter f) of said EU Reg. 2016/679, to file a complaint before the Data Protection Authority.

You have the right to object at any time, for reasons connected with your particular situation, to the processing of your personal data, pursuant to art. 6 point (f) GDPR (legitimate interest of the Controller).

Date of review : 12/09/18