



**PRIVACY POLICY FOR CUSTOMERS AND
POTENTIAL CUSTOMERS PURSUANT TO
ART. 13 AND 14 OF THE EUROPEAN DATA
PROTECTION REGULATION**

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Axxam Spa (hereinafter, the "**Company**") is very attentive to privacy and the protection of the personal data it processes in the exercise of its activities.

This policy (the "**Privacy Policy**") has therefore been prepared by the Company for the purpose of describing to you, as a customer and/or potential customer or as a contact person of client companies and/or potential customers (hereinafter "**You**" or the "**Customers**") how we collect and process your personal data (hereinafter collectively referred to as the "**Data**"), as well as to illustrate the choices available to you with regard to the processing of your Data and the exercise of your rights, in accordance with the provisions of European Regulation 2016/679 on the general protection of personal data ("**GDPR**") and Legislative Decree 196/2003 and subsequent amendments (the "**Privacy Code**" and, together with the GDPR, the "**Applicable Privacy Legislation**").

1. DATA SUBJECT TO PROCESSING

We collect your Data directly from you or from the company of which you are the contact person, and we process them for the purposes indicated in the following paragraph.

The Data processed may include:

- your personal data (name, surname, date of birth, tax code),
- your contact details (address, telephone, email),
- your business function,

Please note that failure to provide Data would not allow us to fulfil, in whole or in part, legal and contractual obligations or to continue business relations with you or with the company for which you are the contact person.

2. PURPOSES, LEGAL BASES OF PROCESSING AND DATA RETENTION PERIOD

Type of treatment	Purpose	Legal bases	Retention period
a) Management of commercial relations	Your Data will be used in order to execute a contract with you or your employer, or, more generally, with the subject for which you are a contact person.	Need to implement contractual and/or pre-contractual measures (Art. 6, par. 1, lett. b), GDPR).	Your Data will be stored for the time necessary to manage contractual relationships.
b) Compliance with legal obligations	Your Data may be used to comply with any legal obligations.	Fulfilment of statutory obligations (Art. 6 (1) (c) GDPR).	Your Data will be stored for the time necessary to comply with legal obligations (e.g. in tax matters).
c) Protection of a right	Your Data may be used in order to ascertain, exercise or defend our	The Company's legitimate interest in establishing, exercising	Your Data will be stored for the time necessary to protect the rights of the Company, and in

	rights, including in court.	or defending its rights (Art. (6) (1) (f) GDPR).	any case until the expiry of the applicable limitation period.
d) Newsletter	Your Data may be used to send you newsletters and communications about products/services similar to those you have already purchased or requested, with the ability to opt out at any time.	The Company's legitimate interest in sending communications to existing customers (Art. 6(1)(f) GDPR), subject to applicable ePrivacy "soft opt-in/soft spam" rules and your right to object at any time (Art. 21 GDPR).	Your Data will be stored until you object/unsubscribe or, absent objection, for the period reasonably necessary in light of your relationship with the Company; minimal suppression-list records may be retained to ensure no further contact after an opt-out.

3. SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED

Your Personal Data may be communicated to any qualified parties who provide the Company with services instrumental to the purposes indicated in this Privacy Policy, who, as the case may be, will operate as data processors appointed by the Company or as independent data controllers. In particular, your data may be communicated to:

- service providers (e.g., IT service providers);
- consultants who assist the Company in various capacities with particular reference to legal, tax, social security, accounting and organizational aspects;
- any other subject to whom the Data must be communicated on the basis of an express provision of law, including the competent Authorities in the event of express and legitimate requests.

4. TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA

Your Data may be transferred outside the European Economic Area. In this case, the Data will only be transferred to countries that guarantee an adequate level of protection to that required by the applicable regulations in the European Union, or, in the absence of adequacy decisions, through the implementation of appropriate safeguards to protect your Data, such as the Standard Contractual Clauses approved by the European Commission with the Implementing Decision (EU) 2021/914 of 4 June 2021. In any case, the transfer of data will be in accordance with the Recommendations (No. 1/2020 and No. 2/2020) published by the European Data Protection Board ("EDPB").

5. YOUR RIGHTS

You have the right to request access to, rectification or erasure of the Data, restriction of processing and to object to our use of the Data, as well as the right to request the delivery of some of it.

Rights of the Data Subject:

Right of way

You have the right to obtain from the controller confirmation as to whether or not Personal Data concerning you is being processed and, where that is the case, to obtain access to the Personal Data and the following information:

- a) the purposes of the processing;
- b) the categories of Personal Data in question;
- c) the recipients or categories of recipients to whom the Personal Data have been or will be disclosed, in particular if recipients are from third countries or international organisations and, if so, the existence of appropriate safeguards;
- d) where possible, the envisaged retention period of the Personal Data or, if this is not possible, the criteria used to determine that period;
- e) the existence of the right of the data subject to request from the data controller the rectification or erasure of the Personal Data or the restriction of the processing of Personal Data concerning him or her or to object to their processing;
- (f) the right to lodge a complaint with a supervisory authority;
- g) if the Data are not collected from the data subject, all available information on their origin;
- (h) the existence of automated decision-making, including profiling, which produces legal effects that concern him or her or similarly significantly affects him and, at least in such cases, significant information about the logic used, as well as the importance and the envisaged consequences of such processing for the data subject.

Right to rectification

You have the right to obtain from the controller the rectification of inaccurate Personal Data concerning you without undue delay.

Right to erasure

The data subject shall have the right to obtain from the controller the erasure of Personal Data concerning him or her without undue delay and the controller shall be obliged to erase the Personal Data without undue delay, if one of the following reasons applies:

- a) the Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- b) the data subject withdraws the consent on which the processing is based and there is no other legal basis for the processing;
- c) the data subject objects to the processing, and there is no overriding legitimate reason for proceeding with the processing;
- d) the Personal Data has been unlawfully processed;
- e) the Personal Data must be erased in order to comply with a legal obligation under European Union law or the law of the Member State to which the data controller is subject;

Rights to restriction of processing

The data subject has the right to obtain from the data controller the restriction of processing when one of the following cases applies:

- a) the data subject contests the accuracy of the Personal Data, for the period necessary for the data controller to verify the accuracy of such Personal Data;
- b) the processing is unlawful and the data subject opposes the erasure of the Personal Data and requests instead that its use be restricted;
- c) although the data controller no longer needs them for the purposes of the processing, the Personal Data are necessary for the data subject to establish, exercise or defend legal claims;
- d) the data subject has objected to the processing, pending verification of whether the legitimate reasons of the data controller prevail over those of the data subject.

Right to object

The data subject has the right to object at any time to the processing of personal data concerning him or her based on the legitimate interest of the data controller, including profiling. You have the right to object at any time to the processing of your Personal Data for direct marketing purposes, including profiling to the extent that it is related to such direct marketing.

Right to Data Portability

The data subject has the right to receive the Personal Data concerning him or her that he or she has provided to a data controller in a structured, commonly used and machine-readable format and has the right to transmit such Data to another data controller without hindrance from the data controller to whom he or she has provided it if:

- (a) the processing is based on consent or a contract; and
- b) the processing is carried out by automated means.

In exercising your rights with respect to Data portability, you have the right to obtain the direct transmission of your Personal Data from one controller to another, if technically feasible.

6. CONTACT DETAILS OF THE DATA CONTROLLER

You can exercise your rights by writing to the data controller, Axxam Spa, at the addresses indicated below:

Axxam Spa

Via Meucci, 3
20091 Bresso MI
Email: privacy@axxam.com

7. COMPLAINTS TO THE ITALIAN DATA PROTECTION AUTHORITY

Any complaints may be submitted to the Data Protection Authority which can be reached at the following contacts or to your competent supervisory authority:

Guarantor for the Protection of Personal Data

Piazza Venezia n. 11
00187 Rome
Fax: (+39) 06.69677.3785
Tel: (+39) 06.696771
Email: garante@gpdp.it
Certified mail: protocollo@pec.gpdp.it

8. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may be amended and updated. Any changes will guarantee, in any case, the full protection of your rights. Should changes be made that may limit the guarantees for the protection of your Data or your rights compared to the current version, you will be promptly informed - before the processing of your Data begins in the new way - through the contacts provided to us.