

INFORMATION PURSUANT TO ART. 13 LEGISLATIVE DECREE 196/2003 AND ARTICLES 13 AND 14 OF THE GDPR - EU REGULATION 2016/679

In compliance with the provisions of art. 13 Legislative Decree No. 196/2003 and Articles. 13 and 14 of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016, **MANTOVANIBENNE S.r.l.**, with registered office in Via A. Righi, 6 - 41037 Mirandola (MO), C.F./ VAT number 00130990369 (hereinafter, "**Controller**"), as the processor of the data, informs you pursuant to Article. 13 Legislative Decree. 30 June 2003 No. 196 (hereinafter, "**Privacy Code**") and Articles. 13 and 14 of EU Regulation No. 2016/679 (hereinafter, "**GDPR**") that your data will be processed in the manner and for the purposes specified below:

1. What Information Will be Processed

The Data Controller processes personal, identifying data (for example, name, surname, company name, address, telephone, e-mail, bank and payment references - hereinafter, "**personal data**" or "**data**") provided by you when concluding contracts for the services of the Data Controller.

2. Purpose of the treatment

The legal basis for processing personal data is the performance of the contract to which the data subject is party. The processing of personal data requested for the establishment of the relationship between you and our company has the purpose of providing:

- all requirements prior to the conclusion of a contract;
- contractual obligations in respect of the data subject while performing an act, or several acts, or both;
- performance of obligations arising from a contract to which you are a party or for the fulfilment of particular requirements on your part, prior to the performance of the contract;
- operations necessary for the fulfilment of the aforesaid obligations;
- obligations connected with or instrumental to the contract which must be performed by any public or private entity;
- fulfilment of legal and fiscal obligations, regulations and Community legislation;
- customer management (customer administration, contracts, orders, shipments and invoices);
- supplier management (supplier administration, contracts, orders, arrivals, invoices);
- management of disputes (contractual defaults, notices, settlements, debt collection, judicial disputes).

Your personal data will also be processed with the following considerations :

A) without your express consent (art. 24 lett. a), b), c), Privacy Code and art. 6 lett. b), e), GDPR), for the following Service Purposes:

- concluding contracts for the services provided by the Controller;
- fulfilling pre-contractual, contractual and tax obligations arising from relations with you;
- fulfilling obligations required by law, regulation, Community legislation or an order of the Authority (such as in the field of anti-money laundering);
- exercise the rights of the Controller, such as the right of defence in legal proceedings;

B) Only after your specific and distinct consent (articles 23 and 130 of the Privacy Code and article 7 of the GDPR), for the following Marketing Purposes:

- concerning: statistics, commercial information, market research, satisfaction survey in relation to the services offered, budgets, technical updates on the quality and competitiveness of new products, invitations to trade fairs; company communications;
- sending you by e-mail, post and/or SMS and/or by telephone contacts, newsletters, commercial communications and/or advertising material on products or services offered by the Data Controller and identifying the degree of satisfaction about the quality of the services;
- sending you commercial and/or promotional communications from third parties (for example, business partners, insurance companies, other companies in the MANTOVANIBENNE S.r.l. Group) by e-mail, post and/or text message and/or telephone contact.

We inform you that if you are already our customers, we may send you commercial communications relating to services and products of the Controller similar to those which you have already used, unless you disagree (art. 130 c. 4 Privacy Code).

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Mantovanibenne s.r.l.

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3. Purpose of the provision

The provision of personal data is necessary to constitute the relationships governed by the law as mentioned in the previous paragraph, and refusal to provide such data would make it impossible to manage such relationships, with the consequent impossibility of establishing such relationships, whether these are employment contracts, or other contracts, or authorizations, or concessions.

The provision of personal data relating to the processing is mandatory with regard to normal business relations. Any either total or partial refusal to supply such data will make it impossible, either totally or in part, to establish the contractual relationship with the undersigned Company.

The insertion of the same data in mailing lists for sending company newsletters, invitations to conferences, sending of information is optional.

Pursuant to Articles 6(1) and 6(2) of the Directive 1 letter b) and c) EU Reg. 2016/679, the processing covered by this information does not require the consent of the person concerned.

The personal data collected and processed by the Data Controller will only be used for the purposes identified in the previous point of this information.

4. How We Use the Information

Processing of your personal data is carried out by means of the operations indicated in art. 4 Privacy Code and art. 4 n. 2) GDPR and specifically: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your personal data is processed both on paper and electronically and/or by automated means. Processing is also carried out in compliance with the methods and requirements of the data provided for by art. 5 of GDPR 2016/679 and includes all or the set of the operations provided for in Articles 7 to 11 of GDPR 2016/679 in accordance with the provisions laid down in Article 7 of GDPR 2016/679. 6 of the GDPR 2016/679, therefore:

- processing is carried out with or without the use of electronic instruments and managed by specially appointed personnel;
- the data are stored in paper form and/or on magnetic/informatics/optical/virtual media;
- manual processing, involving collection of data in special registers and/or forms, the storage of which is carried out by storing them in special containers.

The Data Controller will process personal data for the time necessary to fulfil the above purposes and in any case for no more than 10 years from the date of termination of the relationship for Service Purposes, and for no more than 2 years from the date of collection of data for Marketing Purposes.

Processing will be carried out in automated and/or manual form, with methods and tools designed to ensure maximum security and confidentiality, by persons specially appointed for this purpose.

In compliance with the provisions of art. 5 paragraph 1 letter e) of EU Reg. 2016/679, collected personal data will be stored in a form that allows identification of data subjects for a period of time not exceeding the achievement of the purposes for which the personal data are processed.

The data stored in the relevant databases will be processed with appropriate instruments to ensure their integrity, security and confidentiality.

The Data Controller will adopt all appropriate technical and organizational measures to guarantee a level of data protection in compliance with the provisions of EU Reg. 2016/679.

Personal data are not processed through an automated decision-making process and no profiling is carried out.

5. Access to data - categories of recipients and areas of processing

Your data may be made accessible to the following subjects for the purposes referred to in item 2.A) and 2.B):

- employees and collaborators of the Data Controller and of the companies in MANTOVANIBENNE S.r.l. Group both in Italy and abroad, in their capacity as internal data manager and/or processors and/or system administrators;
- third party companies or other subjects (e.g., credit institutions, professional offices, consultants, insurance companies for the provision of insurance services, etc.) that perform outsourcing activities on behalf of the Data Controller, in their capacity as external data processors.

Some data may be communicated, within the exclusive scope of the purposes indicated and with the necessary guarantees of confidentiality and protection of personal data, to the following categories of subjects:

- Institutes and Bodies of the State Administration;
- Management and administration consultancy companies (accountants, auditing and certification firms, auditors, lawyers);
- Banking, insurance and credit recovery companies;
- Companies of MANTOVANIBENNE group (associated and/or controlled);
- Product distribution agencies and companies of MANTOVANIBENNE group;
- Transport and logistic infrastructures companies (couriers);
- IT services companies (Internet providers, server farms, security, management of archives and document processes with digital signatures, EDI).

6. Communication of data

Without the need for an express consent (ex art. 24 lett. a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), the Data Controller can communicate your data for the purposes referred to in item 2.A) to Supervisory Bodies (such as IVASS), Judicial Authorities, insurance companies for the provision of insurance services, as well as to those persons to whom the communication is required by law to carry out the above purposes. These subjects will process the data in their capacity as autonomous data controllers.

Your data will not be disseminated nor disclosed.

7. Transfer of Data

Personal data are stored on servers located in Mirandola (MO), within the European Union. In any case, it is understood that the Controller, should it be necessary, will have the right to move the servers even outside the EU. In such case, the Data Controller hereby assures that the extra-EU transfer of data will be carried out in compliance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided by the European Commission.

8. Data provision and consequences of refusal to provide

Provision of data for the purposes referred to in item 2.A) is mandatory. Without them, we will not be able to ensure the services of item 2.A).

Provision of data for the purposes referred to in item 2.B) is instead optional. You may therefore decide not to provide any data or to subsequently deny the possibility of processing data already provided: in such case, you will not receive newsletters, commercial communications and advertising material relating to the Services offered by the Controller. In any case, you will continue to be entitled to the Services referred to in item 2.A).

9. Rights of the data subject

In your capacity as data subject, the rights set forth in Article 7 Privacy Code and art. 15 GDPR shall remain unaffected, and specifically the rights of:

- obtain confirmation of the existence or absence of personal data concerning you, even if not yet recorded, and their communication in intelligible form;
- obtaining an indication of:
 - the origin of the personal data;
 - the purposes and methods of processing;
 - the logic applied in case of processing with the aid of electronic instruments;

d) the identification data of the Controller, managers and representative appointed pursuant to art. 5, paragraph 2 Privacy Code and art. 3, paragraph 1, GDPR;

e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them as appointed representative in the territory of the State, managers or agents;

iii. obtaining:

a) updating, rectification or, when you have an interest, integration of the data;

b) cancellation, transformation into anonymous form or blockage of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;

c) certification to the effect that the operations as per letters a) and b) have been notified, also in relation to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;

iv. opposing, in whole or in part to:

a) for legitimate reasons, the processing of personal data concerning you, even if pertinent to the purpose of collection;

b) processing of personal data concerning you for the purpose of sending advertising materials or direct selling or for carrying out market research or commercial communication, through the use of automated calling systems without the intervention of an operator by e-mail and/or by traditional marketing methods by telephone and/or mail. Please note that the right of opposition of the person concerned, set out in point b) above, for purposes of direct marketing through automated means, extends to traditional modes and that it remains however the possibility for the person concerned to exercise the right of opposition, even if only in part. Consequently, the data subject may choose to receive only communications by traditional means or only automated communications or neither.

Where applicable, you also have the rights under Articles 16-21 GDPR (Right to rectification, right to be forgotten, right to limit processing, right to data portability, right to oppose, revoke your consent as easily as it was given, at any time, without prejudice to the lawfulness of the processing based on consent before revocation (in cases of processing based on consent); to obtain access to personal data, and access to the following information:

a) receiving from the data controller confirmation as to whether or not personal data concerning the data subject are being processed;

(b) receiving all information relating to the purposes of the processing, the nature of the personal data concerned, the recipients or categories of recipients to whom the personal data have been or will be disclosed (indicating whether they are recipients in third countries or international organisations), the envisaged period of retention of the personal data or, if that is not possible, the criteria used to determine that period; lodging a complaint with a supervisory authority; obtaining the rectification and/or erasure of the data processed; not being subject to any decision based solely on automated processing, including profiling, which produces legal effects concerning him or significantly affects his person in a similar manner, as well as having the right to lodge a complaint with the Privacy Authority.

Pursuant to art. 34 of the above mentioned Regulation, the concerned party also has the right to be informed about the violation of his/her personal data that may entail a high risk for his/her rights and freedoms.

10. Modes of exercising rights

The concerned party may at any time exercise the rights referred to in Article 7, par. 3, 15 et seq. EU Reg. 2016/679, as well as to receive the communication referred to in art. 34 of the above-mentioned Regulation.

These rights may be exercised by sending a notice addressed to the Data Controller of the personal data, MANTOVANIBENNE S.r.l. with registered office in Via A. Righi, 6 - 41037 Mirandola (MO), C.F./VAT number 00130990369, Tel. +39-0535-615811, fax +39-0535-615830, e-mail PEC mantovanibenne@pec.confindustriamodena.com.

11. Data Controller, responsible and appointed persons

The data controller is: MANTOVANIBENNE srl with registered office in Via A. Righi 6 41037 Mirandola (MO) Telephone +39.0535/615811 - Fax +39.0535/615840 - e-mail: PEC: mantovanibenne@pec.confindustriamodena.com - Website www.mantovanibenne.com.

The updated list of responsible and appointed persons in charge of the data processing is kept at the registered office of the Data Controller.

Mirandola, 22/05/18 MANTOVANIBENNE S.r.l.

DECLARATION OF ACCEPTANCE

By signing this statement, the customer/supplier declares to have been fully and completely informed, and therefore to be aware, of the legal basis, purposes and methods by which the processing of personal data will be carried out, in accordance with the provisions of Regulation EU 2016/679.

The undersigned concerned having taken note of the information provided pursuant to art. 13 Privacy Code, Articles 13 and 14 of the GDPR and Articles 5) and 6) of the GDPR (principles applicable to the processing of personal data - lawfulness of processing),

- GIVE CONSENT
 DOES NOT CONSENT

Place date

.....
Stamp and signature

In order that MANTOVANIBENNE S.r.l. may process your personal data, please return us a copy signed by post or fax +39-0535-615840 or by certified electronic means.