

Subject Matter: Privacy policy, in accordance with article 13, EU Regulation 679/2016 – “GENERAL DATA PROTECTION REGULATION” (hereinafter “GDPR”) – and Legislative Decree 196/2003, integrated by Legislative Decree 101/2018.

This is to inform you of how EUROTEC S.r.l. (hereinafter also the “Company”) processes the personal data you provided as our Client (or representative of one of our Clients). This privacy policy is also available on our websites: www.elettrobar.it , www.colged.it , www.colged.de , www.colges.es . Unless otherwise provided, all mentioned articles refer to the policy identified in the title.

1) Data Controller

The Data Controller is Eurotec S.r.l., with headquarters in Viale Europa 24, San Pietro di Legnago (37045 - VE, Italy), VAT n. IT12073160157, in the person of its legal representative, Roberto Guizzardi. This privacy policy applies explicitly to the Washing Divisions.

2) Designation of the Data Protection Officer

A Data Protection Officer was not appointed, as the provisions in article 37 of the GDPR and in the various interpretations of the Data Protection Authority do not apply to the Data Controller.

3) Data Subject to Processing

Processing activities involve personal data:

1. any identification and contact details (for example, name, surname, qualifications, address, telephone number, email address, role in the company), hereinafter “personal data”, you provided during the preparation, conclusion or execution of supply and service contracts with the Data Controller.
2. any data pertaining to the financial reliability of administrators, as part of the commercial information requested by the Company during the client validation process.
3. any data provided voluntarily during credit collection activities, including those pertaining to special categories.
4. any data collected to manage visas to enter Italy (e.g. passport copies), and in general to manage relationships with consulates, embassies, etc.

4) Data Provision, Purpose and Legal Basis of Data Processing

The data described in point 3.1 are processed to execute the contract stipulated with the Data Controller. Lawfulness is based on article 6, paragraph 1), letter b) of the GDPR. Data provision is mandatory. Failure to provide these data will result in the impossibility to manage the contract correctly.

The data described in point 3.2 are processed to meet a legitimate interest of the Data Controller (asset protection). Lawfulness is based on article 6, paragraph 1), letter f).

The data described in point 3.3 are processed to meet a legitimate interest of the Data Controller (asset protection). Lawfulness is based on article 6, paragraph 1), letter f), and article 9, paragraph 2), letter e).

The data described in point 3.4 are processed to execute ancillary aspects of the contract stipulated with the Data Controller. Lawfulness is based on article 6, paragraph 1), letter b) of the GDPR. Data provision is mandatory. Failure to provide these data will result in the impossibility to manage the aspects of the contract described in point 3.4.

5) Processing Methods and Duration

Your personal data as described in point 3.1, and possibly 3.4, are processed by carrying out the operations described in article 4, n. 2) of the GDPR and in particular: collecting, recording, organizing, conserving, consulting, using, blocking, communicating, erasing and destroying. Your data are processed on paper and electronic and/or automated format.

All the data you provide for fiscal/administrative purposes will be stored in our database for 10 years, as provided by the applicable legislation. Unless otherwise provided, all the data you provide for non-fiscal purposes will be stored until the end of the contract based on which they were provided.

Your personal data as described in point 3.2, which may be collected for the purposes described in point 4, are processed by carrying out the operations described in article 4, n. 2) of the GDPR and in particular: collecting, consulting, using, deleting and destroying. Data are processed lawfully and are limited to those nec-

essary for company security purposes, balancing the Data Controller's interests with data subject protection, with particular reference to the provisions in article 10.

Your personal data as described in point 3.3, which may be collected for the purposes described in point 4, are processed by carrying out the operations described in article 4, n. 2) of the GDPR and in particular: collecting, recording, organizing, consulting, using, communicating, erasing and destroying. Data are processed lawfully and are limited to those necessary for company security purposes, balancing the Data Controller's interests with data subject protection.

6) Data Access

Your data may be accessed for the purposes described in point 4) by the Data Controller's employees and collaborators, in their capacity as internal data processors and/or system administrators, or by third-party companies or other subjects outsourced by the Data Controller (including but not limited to credit institutions, private firms, consultants, insurance companies for the provision of insurance services, etc.), in their capacity as external data processors.

7) Data Communication

Without your expressed consent – as provided by article 6, paragraph 1), letters b) and c), and article 9, paragraph 2, letter e) of the GDPR – the Data Controller may communicate your data for the purposes described in point 4) to supervision organs, judicial authorities, insurance companies for the provision of insurance services, and to subjects to whom communication is necessary for the purposes therein. These subjects will process the data as autonomous data controllers. Your data will not be diffused.

8) Data Transfer to Non-EU Countries

Personal data, as described in point 3), are retained in electronic and/or paper format on servers and/or archives located at the Data Controller's headquarters, within the European Union. However, the Data Controller will have the right, if necessary, to move the archives and servers to other EU or non-EU countries, for example if it makes use of Cloud services or if data has to be transferred to the parent company ITW, in Glenview, Illinois, in the United States. In any case, the Data Controller assures that any data transfer to non-EU countries will be subject to all applicable laws and the standard contractual clauses established by the European Commission.

9) Data Subject Rights

As data subject, you have the rights set by articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR. In detail:

- Right to access
- Right to rectify
- Right to erase (right to be forgotten)
- Right to limit processing purposes
- Right to the requirement of notification if your data are rectified or deleted or the processing purposes limited
- Data portability right
- Right to object to data processing
- Rights pertaining to the automated processing of personal data, including profiling

10) Methods to Exercise Data Subject Rights

At any time, you may exercise your rights by sending:

- a letter by recorded mail to the Data Controller, at the address in point 1)
- an email to privacy@elettrobar.it or privacy@colged.it

EUROTEC S.r.l.