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Cap. Soc. € 100.000,00

R.E.A. Nr. 123908

Cod. Fisc. / P. IVA / N° Iscriz. Reg. Imprese

IT 01148810391



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Information notice pursuant to Article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR)

Dear Supplier/Customer,

this information is provided to you not only to comply with the obligations imposed by the Laws on the protection of personal data, in particular Article 13 of the EU Regulation 2016/679 (GDPR), but also because the Company FAM s.r.l. believes that the protection of personal data is a fundamental value of its business and wishes to provide you with any information that may help you to protect your confidentiality and control the use that is made of your personal data in the execution of the contractual relationship.

Data Controller: The Data Controller, i.e. the entity that determines the purposes and means of the processing of personal data, as well as the security procedures to be applied in order to ensure the confidentiality, integrity and availability of such data and to whom you may contact to exercise the rights recognized by the GDPR, is the Company FAM s.r.l., registered office in Via Pasolini 38/39, 48018, Granarolo Faentino, Ravenna (RA), P.IVA:IT01148810391.

The Data Controller can be contacted by forwarding an e-mail to: info@fonderiafam.com, PEC: fonderiafam@pec.it, Telephone: 0546/41494 taking care to specify the reason for the request.

Purpose of processing and basis of legitimacy: Your personal data are processed:

(a) For purposes strictly related and instrumental to the proper establishment and execution of the contractual relationship. The provision of your personal data, for this purpose, is compulsory because, since it is information that is strictly necessary for the definition of the contractual agreement and its subsequent implementation, its absence would prevent the completion of the contractual relationship itself. The basis of lawfulness of processing, for this purpose, is represented by Art 6, par.1, letter b) GDPR;

(b) To comply with legal obligations, regulations, EU regulations, and to fulfill current administrative, accounting and tax obligations. The provision of your personal data, for this purpose, is compulsory because, since it is strictly necessary information for the definition of the contractual agreement and its subsequent implementation, its absence would prevent the completion of the contractual relationship itself. The basis of lawfulness of processing, for this purpose, is represented by Art 6, par.1, lett. c) GDPR;

(c) To establish, exercise or defend legal claims The lawful basis for processing, for this purpose, is represented by Art 6(1)(f) GDPR and your consent is not required as the Data Controller pursues its legitimate interest in ascertaining, exercising or defending in court its own right.

The Data Controller will administer specific disclosures in relation to any further data processing put in place.

Categories of personal data processed: We process only personal data strictly necessary for the purposes mentioned above, which may include personal data, address/domicile, contact data (telephone number, e-mail address, PEC, fax), order number/customer code, billing, shipping and payment information, tax information.

We do not process special categories of personal data under Art 9 GDPR (also called “sensitive data”) or so-called “judicial” data under Art 10 GDPR (data related to criminal convictions and offenses).

Method of data acquisition: Your data is communicated to us directly by you, either at the pre-contractual stage or at the time of contract conclusion, including at trade fairs or industry events or during professional interactions with our Agents/Commercial Consultants.

Retention Timeframe: Your personal data will be processed for the entire duration of the contractual relationship and retained for a period of 10 (ten) years starting from the termination of the relationship, unless a longer period is required by law or if the data are necessary for the defense of the rights of the Data Controller

Automated decision-making process: There is no automated decision-making, including profiling, as referred to in Article 22(1) and (4) of the GDPR, including profiling; therefore, no decisions are made by an algorithm without human intervention.

Transfer of data to Third Countries and/or International Organizations: Pursuant to Article 45 GDPR, for the purposes mentioned above and as a consequence of the use of information society services (e-mail service), your data may be subject to transfer to Third Countries, specifically to the United States of America, to entities located in the United States that have been certified under the EU-U.S. Data Privacy Framework, which has been recognized by an adequacy decision of the European Commission dated July 10, 2023, pursuant to Article 45 of the GDPR. to the Data Subject, as they are registered in the "Data Privacy Framework Program" list, in compliance with the adequacy decision of July 7, 2023 of the European Commission (EU-US Data Privacy Framework). Any transfer of personal data being processed or intended to be processed after transfer to a third country, shall take place in strict compliance by both the Data Controller and its Processors with the provisions of Chapter V of the Regulations. All the provisions of the relevant Chapter V are applied in order to ensure that the level of protection of natural persons guaranteed by the Regulation is not undermined.

Communication and dissemination of personal data: Your personal data will not be disseminated, this term being understood to mean giving knowledge of them to unspecified subjects in any way, including by making them available or consulting them.

It may be communicated to and processed by parties internal and/or external to the Company, in particular:

Internal Recipients: Authorized Personal Data Processors: natural persons acting under the authority of the Data Controller, specially appointed and authorized, pursuant to Article 29 GDPR, to process personal data as part of their duties and activities, having received specific training and operational instructions to that effect.

External recipients: which may include subjects to whom the communication of data must be made in fulfillment of an obligation provided for by law, regulation or EU legislation, or to comply with an order of the Judicial Authority, such as, for example, Revenue Agency and other Public Bodies.

Data Processors: all our Data Processors have been appointed in accordance with Article 28 GDPR and have the guarantees required by Article 32 GDPR. The full list of Data Processors is available upon request of the data subject by contacting the Data Controller.

Such external recipients include:

- a. Companies/professional firms that provide assistance, advice or collaboration to the Data Controller, in labor, accounting, administrative, tax, legal, fiscal and financial matters;
- b. Third party service providers to whom communication is necessary for the performance of the services covered by the contract;
- c. Banking, credit and financial institutions;
- d. Additional parties, but only in relation to company fulfillments arising from any specific requests or initiatives of the supplier/customer itself.

Place and manner of data processing: Your personal data are processed on the premises of the Data Controller and its Data Processors using paper and computer tools, only by staff who have been trained in advance, continuously updated

and specially authorized in writing for this purpose. Your personal data are processed in compliance with the relevant legislation, in particular EU Regulation 679/2016 and the relevant Measures and Guidelines, and specifically for computer data, in compliance with the Guidelines of the Guarantor for the protection of personal data for e-mail and internet. The Data Controller adopts security measures - technical and organizational - such as to protect the entire process of management of personal data and the tools used for their processing. These measures are prepared in order to guarantee their availability, integrity, accessibility, security and confidentiality. The Data Controller, also availing itself of the professional expertise of its Data Processors, keeps this system of protection and security of the personal data of data subjects constantly updated. This is also done in response to technical evolution, changes in the technological environment, and new cyber or other threats. In addition, the Data Controller conducts periodic assessments to ensure that the level of security is always appropriate to the risk, understood as the risk of negative impacts on the freedoms and rights of data subjects, including taking into account the state of the art, the nature of the data, and the specific characteristics and purposes of the processing operations under its responsibility. This is because the Data Controller is well aware that accidental or unlawful loss, alteration, and unauthorized disclosure of processed personal data could impact the rights and freedoms of data subjects. A data breach could result in discrimination, loss of control over personal data, damage to reputation and privacy, emotional distress, financial harm, etc. These consequences can be significant and have a lasting impact on an individual's rights and freedoms.

Protection of the personal data management process: In order to avert these consequences, the Data Controller processes your personal data by appropriate means to reduce the risk of dispersal or breach by unauthorized third parties, putting in place adequate technical and organizational measures to ensure a level of security appropriate to the risk, which include, in summary: the use of data encryption, pseudonymization or anonymization techniques, when possible; saving data on servers; adoption of a disaster recovery plan; automatic data backups; use of antivirus and firewalls; adoption of the TLS/SSL encryption protocol for communications sent through e-mail; access to information systems allowed only to authorized personnel by entering individual usernames and passwords; use of passwords that have characteristics in accordance with best practices; configuration of computer systems in such a way as to allow the tracking of access and, where appropriate, of the activities carried out in charge of the different types of users; in relation to persons acting as System Administrators, a log management system is envisaged for the purpose of punctual tracking of the activities carried out and the storage of such data for a period of time of not less than six months, in such an unalterable manner as to allow them to be checked a posteriori; training and information path addressed to people who process data, also through the adoption and observance of internal regulations (policies, procedures, disciplinaries, job descriptions); contracts with data processors and written appointments for authorized persons, through which the scope of permitted processing is regulated; confidentiality obligations; observance of the principle of data minimization and the other principles set forth in art 5 gdpr; preparation of a register of processing activities ex art 30 gdpr in electronic format, constantly updated; storage of personal data of data subjects in restricted and limited access locations; registration of all subjects who, for any reason, access our premises; adoption and observance of specific procedures to ensure and facilitate the exercise of the rights of data subjects; adoption of a specific procedure for the management of security incidents and breaches of personal data; periodic vulnerability analysis activities, aimed at detecting the state of exposure of vulnerabilities. These audits are supplemented periodically with special penetration testing techniques. The results of these audits are analyzed by competent technical personnel in order to identify and implement the necessary and appropriate improvements to ensure the required level of security.

Principles applied to processing: We process your personal data in accordance with the legal regulations on the protection of personal data, in particular in compliance with the provisions of Article 5 of the GDPR, therefore, your personal data are:

- (a) processed lawfully, fairly and transparently ("lawfulness, fairness and transparency");
- (b) collected for specified, explicit and legitimate purposes, and subsequently processed in a manner that is not incompatible with those purposes ("purpose limitation"); and
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("data minimization")

(d) accurate and, if necessary, kept up to date. We take all reasonable steps to delete or rectify in a timely manner data that are inaccurate in relation to the purposes for which they are processed ("accuracy");

(e) kept in a form which permits identification of data subjects for a period of time not exceeding the fulfillment of the purposes for which they are processed ("retention limitation");

(f) processed in a manner that ensures adequate security of personal data, including protection, through appropriate technical and organizational measures, from unauthorized or unlawful processing and accidental loss, destruction or damage ("integrity and confidentiality").

Data Subject Rights: In relation to the personal data subject to the processing referred to in this notice, you are granted, at any time, in accordance with, within the limits and under the conditions provided for in Articles 7.3 - 15 - 16 - 17 - 18 - 20 - 21 GDPR, the right to:

a) **Revoke previously given consent (art 7.3 GDPR), if applicable:** right to request, at any time and in an easy and free manner, the revocation of consent previously given. Revocation of consent does not affect the lawfulness of the processing based on the consent before revocation;

b) **Access (art 15 GDPR):** right to request confirmation that there is, or is not, processing inherent to your personal data, without having to justify the request and, if so, to obtain access to the same data and a copy thereof;

c) **Rectification and integration (art 16 GDPR):** right to obtain, even by providing a simple supplementary declaration, the rectification of inaccurate personal data and the integration of insufficient or outdated data concerning you;

d) **Deletion (art 17 GDPR):** the right to obtain the deletion of your personal data, if there is even one of the reasons provided for in art 17 GDPR;

e) **Limitation (art 18 GDPR):** right to obtain that your data be "frozen," "blocked," processed but only for the purpose of storage, resulting in the impossibility of any other processing operation other than storage for the period of limitation, under the conditions and within the limits imposed by art 18 GDPR;

f) **Portability (art 20 GDPR):** the right to receive, in a structured format in common use and readable by automatic device, the personal data concerning you in order to transmit them, without hindrance from us, to another Data Controller;

g) **Objection (art 21 GDPR):** right to object at any time, for reasons related to the particular situation, to the processing of personal data concerning you, under the conditions and within the limits provided for in art 21 GDPR.

The exercise of the aforementioned rights may be exercised by written communication, direct to the Data Controller, to be sent to the e-mail address: info@fonderiafam.com, or PEC: fonderiafam@pec.it or by paper mail to the address of the registered office of the Data Controller.

Complaint to the supervisory authority: Without prejudice to any other administrative or judicial remedy, if you believe that the processing that concerns you violates the GDPR, you have the right, pursuant to Article 77 GDPR, to lodge a complaint with a supervisory authority, namely in the Member State in which you habitually reside, work or of the place where the alleged violation occurred. The Supervisory Authority to which the complaint has been submitted shall inform the complainant of the status or outcome of the complaint, including the possibility of a judicial remedy under Article 78 of Regulation 679/2016.

Place and date: Granarolo Faentino (RA). This policy is updated as of February 6, 2025. Any changes to the processing carried out by the Data Controller will be communicated to the Data Subjects by updating it.

The Data Controller is available to provide you with any possible clarification regarding your personal data.

THE DATA CONTROLLER: FAM s.r.l.