

**Subject: DISCLOSURE and declaration of CONSENT - CUSTOMERS - relative to the processing of personal data in accordance with and pursuant to art. 7, 13 and 14 of EU Regulations 2016/679 (GDPR) and current national regulations.**

Dear Customer,

**ACCIAIERIE DI VERONA S.p.A.** (hereinafter referred to as "ACCIAIERIE DI VERONA", the "Company" or the "Official in Charge of Data Processing") recognises the importance of the protection of personal data and is pro-actively committed to processing it in a responsible way, and in a way consistent with both EU Regulations 2016/679 (GDPR) and current national regulations.

To such an aim, this disclosure describes the practices related to Privacy which are applicable to the personal information that we collect, use and if necessary share - information relating to the Customers with which we have and/or we anticipate having a business relationship.

In order to guarantee a coherent and high level of protection of the above-mentioned data, we wish to get you up to date in your role as the "**Interested Party**" (that is, the person to whom the data to be processed relates) about the technical and managerial measures taken by the Company and about the primary elements of the operations it carries out.

#### **Purpose and legal basis for the data processing.**

The collection and the processing of personal data is carried out with the following aims:

1. to establish and to execute current contractual relationships, therein comprised of the acquisition of information that is preliminary and preparatory for the conclusion of the contract, and for any activity relating to pre- and post-sales assistance;
2. to fulfil all the operational requirements imposed by regulatory requirements, fiscal and taxation regulations, commercial uses and anti-money laundering rules;
3. to manage relationships connected to the activities of administration, accounting, orders, shipments, invoicing, various services and any litigation;
4. to carry out marketing communications through which the Company can promote the products and/or the services it provides without the use of any intermediaries;
5. to safeguard credit rights and credit standing arising from the contractual relationship;
6. to process statistical information for internal use only.

Such information will be subject to processing which follows the principles of correctness, legality and transparency, in addition to protecting your confidentiality and rights.

Unless otherwise specified, the legal grounds for the processing of the data is art. 6 comma 1 letters a), b), c) and f) of EU regulation 2016/679 (GDPR).

- a) the Interested Party has expressed their consent to the processing of their own personal data for one or more specific purposes;
- b) the processing is necessary for the execution of a contract of which the Interested Party is a part of, or to execute pre-contractual measures adopted following a request by the Interested Party;
- c) the processing is necessary in order to fulfil a legal obligation to which the Official in charge of data processing is subject;
- f) the processing is necessary for the pursuit of the legitimate interest of the Official in charge of data processing or of third parties.

### **Anti-Money Laundering and Anti-Terrorism.**

The conferral of the data described by the legislation on the matter of Anti-Money Laundering and Anti-Terrorism is obligatory and any refusal precludes the provision of the requested service, and may involve a report being made to the appropriate supervisory authority. On this point, please note that the processing of personal data connected to the Anti-Money Laundering obligations will take place according to the specific methods imposed on non-financial operators by the Regulations on the subject of identification and preservation of information described by art. 3 comma 2 of the Italian legislative decree no. 56/2004 and adopted with Ministerial Decree no. 143/2006. Other information may also be drawn from public records in order to comply with the obligations as per Italian legislative decree 231/2007.

### **Mode of processing.**

The processing of data for the outlined purposes will be carried out both in electronic (for example, electronic or magnetic storage) and non-electronic (for example, paper records) forms according to the privacy and safety rules laid out by legislation, regulations and internal provisions.

### **Place of processing.**

The data is currently being processed and archived at the ACCIAIEREI DI VERONA headquarters, Zona Industriale Rivoli - 33010 Osoppo (UD). The data could furthermore be processed on behalf of the undersigned by other companies in the Group, that is, companies and/or professionals (including external) according to the requirements necessary for the carrying out of the services entrusted to them.

### **Conferring of the data.**

Some data is indispensable for the setting up of the contractual relationship or for its execution. The conferring of data to the undersigned is obligatory only for data for which there exists a regulatory or contractual obligation.

In the case in which the conferring of data is expected by a regulatory or contractual obligation, any refusal to confer it would prevent the setting up of and/or execution of the contractual relationship.

### **Communication of the data.**

Your data may be communicated, in compliance with legislation on the protection of personal data, to the following:

- professionals and advisers, advising companies, credit institutions, credit insurance companies and companies operating in the field of transportation;
- private and public agencies, including through inspections or checks like, for example: the Tax Authority, the Tax Police, the Judicial Authority, the Italian Exchange Bureau, INL, ASL, Social Security Agencies, ENASARCO, Chamber of Commerce, etc.;
- other companies in the Group, including ones with headquarters abroad (see the following paragraph);
- persons able to gain access to your data under legal provisions.

### **Transfer of the data abroad.**

The data supplied may be transferred directly by ACCIAIERIE DI VERONA to other companies in the Group, including ones with headquarters abroad, within the requirements outlined above.

In the case that one of the persons designated by the Company as responsible for data processing (pursuant to art. 28 GDPR) thinks it necessary by way of exception to communicate the data of the Interested Party abroad, authorization from ACCIAIERIE DI VERONA will need to be requested, clearly stating the Country of destination and including a guarantee that they intend to adopt to render the transferal safe, respecting the rules set out by the Regulations on the subject and current national regulations.

#### **Period of data storage.**

The supplied data can be stored for the entire duration of the commercial relationship and according to the following parameters:

- after the cessation of the contract: 10 years;
- for activities of administration, accounting, orders, management and budgeting of the entire production flow, assistance and maintenance, shipment, invoicing, services, and the management of any litigation: 10 years, as set out by art. 2220 of the Civil Code and without prejudice to any late payments that may justify an extension;
- for the carrying out of marketing communications through which the Company can promote the products and/or the services it provides without the use of any intermediaries: 24 months, without prejudice to the Interested Party expressing at any time their refusal (the so called *opt-out*) to the processing of data for the purpose of direct marketing.

#### **Rights of the Interested Party.**

The Interested Party, as set out by art. 15-22 GDPR, can exercise their right to access their personal data and its transferability. They can demand its updating, rectification or integration as well as, in the cases described by the current provisions, cancellation or limitation - that is, to oppose the processing.

In the event in which the processing of personal data has been carried out in an illegitimate way, the Interested Party may lodge a complaint with a supervisory authority.

With the exception of the fulfilment of obligations described by current regulations at the time of revocation, the Interested Party can at any time revoke their consent to processing by FERRIERE NORD by contacting the Delegate of the Official in charge of data processing on the subject of privacy.

#### **Official in charge of data processing.**

The Official in charge of data processing is ACCIAIERIE DI VERONA S.p.A., with headquarters in Zona Industriale Rivoli - 33010 Osoppo (UD).

The person delegated for matters of privacy, who you will be able to contact for any clarifications and in order to exercise your rights as per art. 15-22 GDPR, is Dr. Dario Pascotto. Your outlined rights can also be exercised by sending a communication to the following email address [privacy@pittini.it](mailto:privacy@pittini.it) or to the fax number +39 0432 062800 or by telephoning +39 0432 062811.

Verona,

ACCIAIERIE DI VERONA S.p.A.

**CONSENT DECLARATION**

(In accordance with art. 7, 13 and 14 of EU Regulations 2016/679)

The Interested Party declares to have received a complete disclosure in accordance with art. 7, 13 and 14 of EU Regulations 2016/679, and expresses their consent to the processing of their personal data as well as to its communication, within the limits and for the purpose and duration specified in the disclosure.

All the authorisations granted by the undersigned can at any moment be definitively revoked via registered letter with notification of receipt or via email to the address [privacy@pittini.it](mailto:privacy@pittini.it) The revocation will have effect from the day following the receipt of the communication. This is without prejudice to the processing imposed by current legislation.

DATE	Customer: _____	STAMP AND SIGNATURE