

Privacy Notice to Users

SICOR S.p.A. with registered office in Viale Caproni 32 – 38068 – Rovereto (TN) VAT no. 00517460226 (hereinafter, “**Data Controller**”), owner of the website <http://www.sicor-spa.it> (hereinafter, the “**Website**”), in its role as **controller of the personal data** of the users who browse on and are registered with the Website (hereinafter, the “**Users**”), hereby provides the privacy notice pursuant to Article 13 of Italian Legislative Decree 196/2003 (hereinafter, the “**Privacy Act**”) and pursuant to Article 13 of EU Regulation 2016/679 of 27 April 2016 (hereinafter, “**Regulation**”, the Regulation and the Privacy Act defined collectively as “**Applicable Legislation**”).

This Website and any services offered via the same are reserved for the use of parties who are 18 years old and over. Therefore, the Data Controller does not collect any personal data relative to parties under the age of 18. Upon the Users' request, the Data Controller will promptly delete any personal data relative to children of under 18 years old that may have been collected involuntarily.

The Data Controller assigns maximum importance to its Users' rights to privacy and personal data protection. The Users can **contact the Data Controller** at any time to seek further information in relation to this privacy notice, using the following methods:

- By sending a registered letter with return receipt of delivery to the Data Controller's registered office
- By sending an email to the address privacy@sicor-spa.it;

1. Purposes of the processing

The Users' personal data will be lawfully processed by the Data Controller pursuant to Article 6 of the

Regulation for the following processing purposes:

- **browsing the website**, in relation to the possibility of identifying the User's technically required data, such as the internet protocol address, while the User is browsing the website.
- **Responding to requests**, received through the contact form.
- **Accessing the reserved areas of the website**: in relation to the possibility of accessing the download area and the user area of the product sales configurator.
- **legal duties**, that is, to fulfil the duties envisaged by the law, by an authority, a regulation or European law.

Conferring personal data for the processing purposes indicated above is optional but necessary, as failure to do so will make it impossible for the User to browse, register with and use the services offered by the Data Controller on the Website.

2. Processing methods and data storage times

The Data Controller will process the Users' personal data using manual and IT tools, in line with logics closely related to the above-mentioned purposes and, in any case, in such a way as to guarantee the security and confidentiality of the data in question.

The personal data of the Users of the Website will be stored for the period of time strictly necessary for fulfilling the primary purposes illustrated above in paragraph 1, or in any case in line with the time needed in order to protect the interests of both the Data Controller and the Users under civil law.

Requests by customers (partners, resellers, customers) to access the web portal of the configurator are processed in compliance with the current Privacy legislation. References to natural persons who are given access credentials are processed with appropriate security measures. Passwords are encrypted and are not visible in unencrypted mode by our persons in charge. Your access request (having read the privacy policy) allows us to process the data provided for the purpose of guaranteeing access to the web portal of the configurator. Different uses are not permitted (for example for marketing purposes).

3. Scope of data communication and dissemination

The employees and/or collaborators of the Data Controller appointed to manage the Website may become aware of the Users' personal data. These parties, who are formally appointed by the Data Controller as "persons in charge of the processing", will only process the Users' data for the purposes indicated herein, and in compliance with the provisions of the Applicable Legislation.

Third parties who may process personal data on the Data Controller's behalf in their role as "**External Data Processors**" may also become aware of the Users' personal data. These include, for example, suppliers of IT and logistics services needed to ensure the functioning of the Website, suppliers of services in outsourcing or cloud computing, professionals and consultants.

The Users are entitled to obtain a list of any processors appointed by the Data Controller, by making a request for the same to the Data Controller using the methods indicated in paragraph 4 below.

4. Rights of the Data Subjects

The Users can exercise the rights guaranteed to them by the Applicable Legislation, by contacting the Data Controller using one of the following methods:

- By sending a registered letter with return receipt of delivery to the Data Controller's registered office
- By sending an email to the address privacy@sicor-spa.it;

Pursuant to the Applicable Legislation, the data Controller informs the users that they are entitled to obtain confirmation (i) of the source of their personal data; (ii) of the purposes and methods used for the processing; (iii) of the logic applied in case of processing carried out with the aid of electronic means; (iv) of the identities of the data controller and processors; (v) of the parties or categories of party to which or whom the personal data can be communicated or that could become aware of the same in their role as processors or persons in charge of the processing.

Additionally, the Users are entitled to obtain

a) **access to their data**, or their **updating, rectification** or, if of interest their **integration**;

b) the **erasure, anonymisation** or **blocking** of the data processed in breach of the law, including those which need not be stored for the purposes for which they were collected or subsequently processed;

c) certification that the operations described in points a) and b) have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, except when fulfilling this requirement proves impossible or would entail using means that are clearly disproportionate to the protected right.

Additionally, the Users have:

- a. the right to **revoke their consent** at any time, should the processing be subject to their consent;
- b. the right to **data portability** (the right to receive all the personal data that concern them in a structured, commonly used and machine-readable format), the right to **restrict the processing** of the personal data and the **right to its erasure** (“right to be forgotten”);
- c. the **right to object**:
 1. fully or partially to the processing of personal data that concern them, for legitimate reasons, even if they are relevant to the purpose for which they were collected;
 2. fully or partially, to the processing of personal data that concern them for the purposes of sending advertising or direct marketing materials, or for carrying out market research or sales communication activities;
 3. should the personal data be processed for direct marketing purposes, at any time, to the processing of their data for said purposes, including profiling, in so far as it is connected with said direct marketing.
- d. should they believe that the processing that concerns them infringes the Regulation, the right to **lodge a complaint to a supervisory authority** (in the Member State in which they are normally resident, or work, or in that in which the alleged infringement has taken place). The Italian supervisory authority is the **Garante per la protezione dei dati personali**, with registered office in Piazza di Monte Citorio no. 121, 00186 – Rome (<http://www.garanteprivacy.it/>).