

INFORMATION FOR CUSTOMERS AND SUPPLIERS

Data processing relating to legal persons does not fall within the scope of the personal data protection provisions established by the Regulation. For the sake of clarity and transparency towards its Customers and Suppliers, Sicor S.p.A. also provides this information to legal persons, describing the methods and purposes of all the processing that the Company carries out or has the right to perform on personal data. The information refers specifically to the data of the natural persons who work for our customers and suppliers.

Foreword

Pursuant to art. 13 of Regulation EU 2016/679, SICOR S.p.A (hereinafter “the Company”), with registered office in Viale Caproni 32 – 38068 – Rovereto (TN), which may be contacted for the exercise of the rights permitted by current legislation at the registered office address or by email at privacy@sicor-spa.it, Data Controller of the personal data already communicated or that will be communicated in the future and where personal data is or will be collected, wishes to inform you that the data concerning you may be processed, in compliance with the above mentioned regulation, by the Company in relation to the contractual relationships in place with you or those that may be entered into in the future.

1)Source of personal data

Personal data, acquired or that will be acquired in relation to contractual relationships or in the pre-contractual phase, is collected directly from the data subject. All personal data collected is processed in compliance with current legislation and, in any case, with the due confidentiality.

2)Nature of collection

For entering into and execution of the contractual relationship, the collection of personal data is also mandatory when having to comply with legal and tax obligations; refusal to provide such personal data will make it impossible to establish relationships with the Company. The related processing does not require the consent of the data subject.

3)Purpose and legal basis of processing

The collection or processing of personal data has the exclusive purpose of providing adequate compliance with the obligations related to the performance of the Company's economic activity and in particular for:

- a. execution of pre-contractual activities and the acquisition of preliminary information for the purpose of signing the contract;
- b. management of the contractual relationship and all the administrative, operational, management and accounting activities related to the contract (order management, invoicing, checks on customer and supplier reliability, assistance and after-sales support);
- c. management of disputes, breaches of contract, notices to comply, settlements, arbitrations, legal disputes;
- d. fulfilment of obligations provided for by laws, regulations, community regulations and measures issued by authorities.

Processing is carried out by virtue of fulfilment of the contractual/pre-contractual and legal obligations related to the relationship established with the Company.

4) Nature of provision and consequences of any refusal

It is mandatory to provide personal data to the Company only for personal data for which there is a legal or contractual obligation to do so, or for personal data necessary to acquire pre-contractual information activated at the request of the data subject. In the event of any refusal to provide such "mandatory" personal data, the contract may not be fully exercised. Any refusal to provide personal data for which there is no obligation to do so, but which is strictly instrumental to the execution of contractual relationships, will not in principle have any consequences in relation to ongoing relationships, except for the possible inability to process transactions related to such personal data or the impossibility of establishing new relationships. Any refusal to provide personal data related to the performance of other activities, not strictly instrumental to the execution of contractual relationships, can only prevent the conduct of such additional activities without other consequences.

5) Processing methods

The processing of personal data will be carried out in a lawful and correct manner and in any case in compliance with the aforementioned regulation, by means of tools that guarantee security and confidentiality and may also be carried out through IT tools able to store, manage and transmit the data.

Processing will be primarily carried out by the internal organisation of the company under the direction and control of the corporate functions and for the purposes indicated above, also by Group companies or third parties, as identified in point 8 below.

The retention of personal data will take place in a form that allows the identification of the data subject for a period of time not exceeding that necessary for the purposes for which it was collected and processed..

6) Duration of processing

Personal data subject to processing will be retained for the time strictly necessary with regard to the contractual relationship, as well as, subsequently, for fulfilment of all the legal obligations connected or deriving from the contract entered into with the Company.

7) Recipients of personal data

Without prejudice to communications carried out in compliance with an obligation of the Law, of a regulation or of community legislation and intercompany regulations, communication, also by simply consulting or making available personal data concerning you, may take place in relation to the following parties:

- a. entities, supervisory bodies, authorities or public institutions;
- b. natural or legal persons providing specific services: data processing, logistics and postal services, customer satisfaction surveys, legal, administrative, tax and/or accounting consultancy, organisation of exhibitions and communication events;
- c. commercial intermediaries, banks and credit institutions, financial brokerage companies, natural or legal persons responsible for credit collection, auditing and/or certification of financial statements and quality systems, independent collaborators of the Company, agents and lead generators, insurers and brokers;
- d. natural and/or legal persons who request references/data for the purpose of participation in public tenders, or in the context of the execution of supply contracts to their customers by SICOR S.p.A.

The parties pursuant to points a), c), d) act as autonomous Data Controllers.

We reassure you that, in any case, the above-mentioned parties receive only either personal data in aggregate and anonymous form or personal data necessary and relevant with respect to the processing purposes they are in charge of.

The list of such third parties will be constantly updated and available to you upon request to the Company. By virtue of the existence of links with the same with electronic, computerised or correspondence means, the personal data may be

made available abroad, possibly also outside the countries belonging to the EU in consideration of the existence of the related authorisation, or on the basis of standard contractual clauses. Personal data will in any case not be disseminated.

8) Rights of the data subject

This without prejudice to your right to exercise the rights of access to the contacts indicated in the foreword to the personal data envisaged by Art. 15 of the Regulation EU 2016/679 and the rights provided for by Arts. 16, 17, 18, 21 of Regulation EU 2016/679 regarding rectification, erasure, restriction of processing and the right to object, in the manner established by art. 12 of the Regulation EU 2016/679.

9) Right to lodge a complaint pursuant to Art. 77 of the EU Regulation to the Supervisory Authority

If our company does not provide you with a response within the time envisaged by the regulation or the response to the exercise of your rights is not deemed appropriate by you, you can lodge a complaint with the Authority for the protection of personal data.

Below are the contact details:

Authority for the protection of personal data

www.gpdp.it - www.garanteprivacy.it

E-mail: garante@gpdp.it - Fax: (+39) 06.69677.3785 - Switchboard: (+39) 06.69677.1