

POLICY REGARDING THE PROCESSING OF PERSONAL DATA

(Art. 13 of EU Regulation no.679 of 27 April 2016, on the protection of personal data "GDPR")

In compliance with requirements imposed by the General Regulation on the protection of personal data, the process Controller hereby provides the data subject with the following information on the processing of personal data carried out.

PROCESS CONTROLLER

Company name PM Oil&Steel S.p.A.

VAT / Tax Code

IT03520360961 / IT03520360961

CONTACTS FOR EXERCISING RIGHTS

Requests to exercise the rights established by the GDPR or any revocation of consent given may be sent to the Controller at the following contact details:

Address

Via Verdi 22 - 41018, San Cesario sul Panaro (MO) - Italy

Contact details

+39 059 936811, referente_privacy@pm-group.eu

CATEGORIES OF DATA SUBJECTS

Customers, Suppliers

PROCESSING

Here below please find a list of the personal data processing involving the data subject

Commercial offers

| Purposes not requiring consent | Purposes | Legal basis |
|--|---|---|
| | Issuing commercial offers | Execution of an agreement and/or precontractual measures |
| | Company Litigation | Execution of an agreement and/or precontractual measures |
| | Archiving of commercial offers | Legitimate interest |
| Types of data processed | PEC (certified e-mail) address, E-mail, Name, Surname, Phone number, VAT number Not providing the data indicated will make it impossible for the Controller to continue with the existing relationship | |
| Storage terms for personal data categories | Category | Storage term |
| | Common | Data processing will be kept for the time necessary to achieve the purposes described in the information notice. The data subject will be stored for the time necessary to assert legal rights. The data will be stored for a period not exceeding 20 years from the issue of the last offer or from the conclusion of order or termination of the contract |

Sales orders

| Purposes not requiring consent | Purposes | Legal basis |
|--|---|---|
| | Execution of sales orders (Execution of an agreement and/or precontractual measures) | Execution of an agreement and/or precontractual measures |
| | Company Litigation | Execution of an agreement and/or precontractual measures |
| | Archiving of sales order and contracts | Legitimate interest |
| Types of data processed | Name, Surname, E-mail, Phone number, PEC (certified e-mail) address, Recipient code, Bank account details, address, VAT number Not providing the data will make it impossible for the Controller to continue with the activities in question | |
| Storage terms for personal data categories | Category | Storage term |
| | Common | Data processing will be kept for the time necessary to achieve the purposes described in the information notice. The data subject will be stored for the time necessary to assert legal rights. The data will be stored for a period not exceeding 20 years from the issue of the order or from the conclusion of the sales or termination of the contract. |

| Accounting and administrative management of customers and suppliers | | |
|--|---|---|
| Purposes not requiring consent | Purposes | Legal basis |
| | Registering invoices in accounts | Execution of an agreement and/or precontractual measures |
| | Payment of invoices | Execution of an agreement and/or precontractual measures |
| | Archiving of invoices | Legitimate interest |
| | Company Litigation | Execution of an agreement and/or precontractual measures |
| Types of data processed | E-mail, Name, Surname, PEC (certified e-mail) address, Phone number, Bank account details, Recipient code, address, VAT number Not providing the data will make it impossible for the Controller to continue with the activities in question | |
| Storage terms for personal data categories | Category | Storage term |
| | Common | Data processing will be kept for the time necessary to achieve the purposes described in the information notice. The data subject will be stored for 20 years from the issue of the accounting-fiscal-administrative document to fulfill legal obligations, as well as the time necessary to assert legal rights. |

| Internal legal support and management of dossiers related to the organisation | | |
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| Purposes not requiring consent | Purposes | Legal basis |
| | Management of dossiers | Legal obligation, Execution of an agreement and/or precontractual measures |
| | Archiving of dossiers | Legitimate interest |
| Types of data processed | Personal details, Medical documents, Criminal record, Summons, Sentences, Deeds of obligation, Legal deeds, Administrative deeds Not providing the data will make it impossible for the Controller to continue with the activities in question | |
| Categories of recipients | Data collected can be notified, for legal obligations or solely reasons functional to executing the agreement, to the following recipient categories: Law firms, Public Safety Authorities, Judiciary, Technical Consultants | |
| Storage terms for personal data categories | Category | Storage term |
| | Common, Judicial, Particular | The Common, Judicial and Particular data will be processed for the time necessary to achieve the purposes indicated above as well as the time necessary to assert legal rights and archived for a period of 20 years from the last correspondence or from the judicial / extrajudicial definition of the dispute. |

| Purchases and relations with suppliers | | |
|---|--|---|
| Purposes not requiring consent | Purposes | Legal basis |
| | Execution of purchases order | Execution of an agreement and/or precontractual measures |
| | Company Litigation | Execution of an agreement and/or precontractual measures |
| | Archiving of purchases order and contracts | Legitimate interest |
| Types of data processed | Name, Surname, Phone number, E-mail, Bank account details, PEC (certified e-mail) address, Bank account details, Recipient code, VAT number Not providing the data will make it impossible for the Controller to continue with the activities in question | |
| Storage terms for personal data categories | Category | Storage term |
| | Common, Judicial, Particular | Data processing will be kept for the time necessary to achieve the purposes described in the information notice. The data subject will be stored for the time necessary to assert legal rights. The data will be stored for a period not exceeding 20 years from the issue of the order or from the conclusion of the order or termination of the contract. |

| Internal and external communications | | |
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| Purposes not requiring consent | Purposes | Legal basis |
| | (Electronic or not) Communication | Execution of an agreement and/or precontractual measures |
| | Archiving of communication | Legitimate interest |
| Types of data processed | Name and Surname, E-mail address, phone number, medical documents, Criminal record (Bodies), Summons, Sentences, Deeds of obligation, Legal deeds, Administrative deeds Not providing the data will make it impossible for the Controller to continue with the activities in question | |
| Categories of recipients | The data of the type Name and Surname, email address, telephone number, can be notified, for legal obligations or solely reasons functional to executing the agreement, to the following recipient categories: The responsible in charge of data processing for carrying out communication activities by e-mail or other messaging channels | |
| Storage terms for personal data categories | Category | Storage term |
| | Common, Judicial, Particular | Data processing will be kept for the time necessary to achieve the purposes described in the information notice. The data will be kept for 20 years from the date reported in the communication or in the last communication in the case of an exchange of correspondence, as well as the time necessary to assert legal rights. |

| Management of certified electronic mail | | |
|---|--|---|
| Purposes not requiring consent | Purposes | Legal basis |
| | Communication by certified electronic mail | Execution of an agreement and/or precontractual measures |
| | Archiving of certified electronic mail | Legitimate interest |
| Types of data processed | Name and Surname, E-mail address, phone number, medical documents, Criminal record (Bodies), Summons, Sentences, Deeds of obligation, Legal deeds, Administrative deeds Not providing the data will make it impossible for the Controller to continue with the activities in question | |
| Categories of recipients | Data collected can be notified, for legal obligations or solely reasons functional to executing the agreement, to the following recipient categories: Law firms, Public Safety Authorities, Judiciary, Technical Consultants | |
| Storage terms for personal data categories | Category | Storage term |
| | Common, Judicial, Details | Data processing will be kept for the time necessary to achieve the purposes described in the information notice. The data subject will be stored for 20 years from the date reported in the communication or in the last communication in the case of an exchange of correspondence to fulfill legal obligations, as well as the time necessary to assert legal rights. |

| RIGHTS OF THE DATA SUBJECT (Arts. from 15 to 22 and from art. 13 of the GDPR) Here below please find the rights the data subject may exercise: | |
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| Right of access | In accordance with art.15 of the GDPR the data subject has the right to request access to his/her personal data. |
| Right of rectification | In accordance with art.16 of the GDPR the data subject has the right to ask the controller to rectify his/her personal data. |
| Right of erasure | In accordance with art. 17 of the GDPR the data subject has the right to ask the controller to erase his/her personal data. |
| Right of restriction | In accordance with art.18 of the GDPR the data subject has the right to ask the controller to restrict the data concerning him/her. |
| Right to object | In accordance with art. 21 of the GDPR the data subject has the right to object to processing. |
| Right of portability | In accordance with art. 20 of the GDPR the data subject has the right to exercise its data portability right. |

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| Additional notes | The data subject may also submit a complaint to the control body (for example the Privacy Authority). |
| AUTOMATED PROCESS | |
| Is there an automated process? | Processing is not based on an automated decision-making process. |