

PRIVACY POLICY NOTICE PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) NO. 2016/679 CONCERNING THE PROCESSING OF CONSUMER PERSONAL DATA IN THE CONTEXT OF WARRANTY REGISTRATION

With this notice we would like to provide you with some information specific to the processing of personal data that you have communicated to us, either directly or through the retailer from which you purchased the product, as part of the registration in your favour of the "*Conventional consumer warranty for the product Laminam*" (hereinafter, the "**Warranty**"), as the purchaser of a product to which the Warranty refers (hereinafter, you will be the "**Consumer**"),

1) WHO IS THE DATA CONTROLLER?

Our society: Laminam S.p.A., based in Fiorano Modenese (MO) via Ghiarola Nuova 258, VAT code/Tax ID. IT01969990355 (hereinafter, "**Laminam**" or the "**Data Controller**").

For further information on this policy note and the processing of personal data carried out by the Data Controller, we can be contacted at the following addresses:

- By standard mail at the registered office in 41042 Fiorano Modenese (MO), via Ghiarola Nuova 258;
- By telephone/fax: 0536 1844200, fax 0536 1844201;
- By e-mail: to privacy@laminam.com

2) WHAT PERSONAL DATA OF THE CONSUMER DO WE PROCESS?

The Data Controller processes the name, surname, e-mail address of the Consumer, the address where the product purchased has been or will be installed, as well as the slab identification code (CODE) (hereinafter, the "**Personal Data**") and further information relating to the purchase made by the Consumer, i.e. the retailer's company name, VAT number and e-mail address.

3) FOR WHAT PURPOSES DO WE PROCESS PERSONAL DATA AND ON WHAT LEGAL BASIS?

Personal data may be processed for:

- 1) managing the request for registration of the Warranty and fulfil and implement the Warranty itself and all the tasks, including organizational tasks, arising therefrom (including the sending of service notices, including automated notices, to the contact details provided, instrumental, for example, to the notification of successful registration, receipt of the certificate of warranty, *etc.*), as well as assistance and support activities in connection with the Warranty;
- 2) fulfilling legal obligations related to civil, tax and administrative provisions;
- 3) asserting and defending own rights, including through extrajudicial initiatives and also through third parties;
- 4) the management of promotional contacts and therefore for the sending of electronic communications, including the newsletter: *a)* commercial, informative and promotional of Laminam's activities and initiatives (including invitations to events) and related products/services also different from those included in the case in point *b)* below; *b)* for the direct sale/promotion of products similar to those already purchased by the Consumer.



The processing is therefore based:

- (i) for the purposes *under 1)* on the need to implement pre-contractual measures taken at the request of the Consumer or the contract to which the Consumer is a party;
- (ii) for the purpose *under 2)*, on the fulfilment of legal obligations to which the Data Controller is subject;
- (iii) for the purpose *under 3)*, on the legitimate interest of the Data Controller in the full defence of their rights;
- (iv) for the purpose *under 4)* in relation to hypothesis a) on the explicit consent of the Consumer, expressly given by ticking the box in the special reserved section of the website and which may be revoked at any time, in accordance with the provisions of para. 9; in relation to hypothesis b) on the legitimate interest of the Data Controller to maintain and increase business relationships with Consumers who have already purchased the products to which the Warranty refers or otherwise similar and to retain them (also pursuant to Article 130, para. 4, Privacy Policy).

4) WHAT ARE THE CONSEQUENCES IF PERSONAL DATA ARE NOT RELEASED?

The release of Personal Data is necessary for the pursuit of the purposes set out in para. 3, "*For what purposes do we process Personal Data and on what legal basis?*", no. 1 and 2. Therefore, any failure to provide - even partial - said data shall prevent the registration of the Warranty and the fulfilment of the obligations connected to its execution (including, therefore, those inherent to the operational and administrative management thereof) or, in any event and more generally, the performance of the activity requested by the Consumer or in the latter's interest.

On the other hand, the release of Personal Data for the purpose indicated in para. 3, no. 4 is optional, since it relates to processing that is not indispensable for the purposes of the Warranty, and any failure to do so will therefore not affect the performance of the same and the ability to fulfil the relevant obligations.

5) HOW DO WE PROCESS PERSONAL DATA?

Personal Data will be processed by means of both manual and computerized tools exclusively by authorized and specially trained persons.

6) TO WHOM MAY WE DISCLOSE PERSONAL DATA?

For the purposes indicated in para. 3, Personal Data may be known by/communicated to:

- those authorized to process data by the Data Controller (employees/operators and collaborators);
- third-party service providers to the Data Controller (including companies or entities providing legal services, insurance, technical and IT service providers service providers, *etc.*);
- third-party companies and professionals appointed to enforce rights, interests, claims of the Data Controller arising from the relationship with the Consumers;
- State administrations, judicial or administrative Authorities, public and private Entities, also following inspections and audits;
- persons who can access the data by virtue of legal provisions or secondary prescriptions or EU



regulations.

The above recipients will act as data processors, autonomous data controllers or authorized persons, as the case may be. To learn about the updated list of recipients or request additional information on the categories of persons who may become aware of their Personal Data, Consumers may contact the Data Controller directly by writing to the contact details indicated in para. 1.

7) HOW LONG DO WE KEEP PERSONAL DATA FOR?

Personal Data will be kept by the Data Controller for the time strictly necessary for the purpose for which it was collected; specifically:

- for the purpose indicated in para. 3 no. 1: at least until the expiry of the period of validity of the Warranty;
- for the purpose indicated in para. 3 no. 2: for the duration prescribed by law;
- for the purpose indicated in para. 3, no. 3, hence for ensuring the right of defence of the Data Controller: at least until the possible exercise of the Consumers' right of objection, it being understood that in the event of the occurrence of problems, failures, disputes or controversies, including non-judicial ones, Personal Data shall be retained for a period equal to the limitation period of the relevant actions, increased by a prudential period of six months for the determination, exercise or defence of a right of the Data Controller;
- for the purpose indicated in para. 3 no. 4: until any revocation of consent by the Consumer or the exercise of the right of objection to which the Consumer is entitled and in any case for a maximum period of 24 months as the case may be, from the giving of consent or from the registration of the Warranty.

In case of revocation or opposition, Personal Data will be deleted unless other activities are being carried out by the Data Controller towards the Consumer; as a matter of fact, in such last hypothesis, Personal Data will not be deleted but will no longer be processed for the specific purpose for which the Consumers have exercised their revocation or opposition (and may be processed, where necessary, for the other purposes). Once the request for revocation or opposition have been received, it may take a few days for them to be processed and then for the Data Controller's records/systems to be updated. Unsubscribing from receiving marketing messages will not interrupt service communications, such as updates regarding the Warranty. In the absence of revocation or opposition, they will be retained within the limits of the periods indicated above.

In all cases, upon expiry of the respective terms, all Personal Data will be deleted or anonymized. This is without prejudice to the fact that the periods indicated may be extended in cases where data storage for a later period is required in the event of litigation, requests by the competent authorities or pursuant to applicable law.

8) DO WE TRANSFER PERSONAL DATA TO NON-EU COUNTRIES?

If, in order to fulfil the purposes set out in para. 3, it becomes necessary to transfer Personal Data to Third Party Countries, such transfer will take place in accordance with the requirements prescribed by European law and therefore in the presence of conditions that ensure a level of protection of Personal Data that



complies with that required by the GDPR. This could happen as part of the performance of services provided to Laminam by third parties.

9) WHAT RIGHTS DO CONSUMERS (OR OTHER DATA SUBJECTS) HAVE TO THE PROCESSING?

Consumers or other Data Subjects may, if the circumstances apply, at any time and free of charge exercise the following rights vs the Data Controller:

- **Right of access:** the Consumers may obtain confirmation from the Controller as to whether or not Personal Data concerning them are being processed and, if so, obtain access to their personal data;
- **Right of rectification:** allows the rectification/supplementation of inaccurate/incomplete Personal Data;
- **Right to deletion:** allows to obtain, in the cases provided for by law, the deletion of own Personal Data;
- **Right of restriction of treatment:** makes it possible to obtain, in the cases provided for in Article 18, para. 1 of the GDPR, the restriction (i.e. the marking of personal data stored with the aim of limiting their processing in the future) of the processing of one's personal data;
- **Right to data portability:** should processing be carried out by automated means on the legal basis of contract or consent, the right to receive in a structured, commonly used and machine-readable format, limited to the data provided to the Data Controller, the Personal Data concerning them, and likewise the right to transmit such data to another Data Controller.

Consumers or other data subjects also have the right to:

- **object** - for reasons, to be made explicit, related to their own particular situation - to the processing of Personal Data carried out by the Data Controller for the purpose indicated in para. 3, no. 3, subject to the clarification in para. 7 about personal data retention;
- in relation to the processing of their data for the purpose indicated in para. 3 no. 4, therefore for the management of promotional contacts:
 - **object** to the processing at any time and without stating any reasons, if the processing is based on the legitimate interest of the Data Controller (lett. b);
 - **withdraw** consent at any time if the processing is based on consent (lett. a);as follows: by clicking the appropriate *link* at the bottom of each *newsletter/email* received to unsubscribe from the *mailing list*. The lawfulness of processing of Personal Data based on consent before revocation is unaffected.

In addition, Consumers or other Data Subjects who consider that the processing of their Personal Data is in breach of the GDPR are entitled to **lodge a complaint** with the national supervisory authority of the European Union member state in which the Data subjects have usual residence or place of work or where the alleged breach of their right occurred (in case such state is Italy, the charged entity is the Italian Data Protection Authority) **or to take appropriate legal action** (art. 79 of the GDPR).

