

PRIVACY POLICY NOTICE IN ACCORDANCE WITH ART. 13 AND 14 OF (EU) REGULATION 2016/679

Even if retailers are usually organised as a company (hereinafter referred to as the "**Retailer Company**") it is possible that, during the Warranty registration procedure, carried out by the Retailer Company in the place of the consumer (i.e. the person who has purchased a product to which the Warranty refers) or by the latter, Laminam S.p.A. becomes aware of some personal data such as name, surname and e-mail address (hereinafter referred to as the "**Personal Data**") of the legal representative of the Retailer Company or of its representatives (hereinafter referred to as the "**Data Subjects**"). Therefore, in its capacity as data controller, Laminam (hereinafter, the "**Data Controller**") deems it appropriate to provide the following brief information regarding the possible processing of the Personal Data of Data Subjects, albeit in their corporate/institutional function.

1) PURPOSES AND LEGAL BASES OF THE PROCESSING AND CONSEQUENCES OF FAILURE TO PROVIDE THE REQUESTED PERSONAL DATA

Personal Data will be processed for the following purposes:

- a) managing the request for registration of the Warranty 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 carrying out any assistance and support activities in connection with the Warranty registration procedure;
- b) asserting and/or defending the rights of the Data Controller in the venues permitted by law, including through extrajudicial initiatives and also through third parties;
- c) fulfilling legal obligations in connection with civil, fiscal provisions, Community legislation, standards, codes or procedures approved by Authorities and other competent Institutions, as well as complying with requests by the competent administrative or judicial authorities and, more generally, by public entities in compliance with legal procedures;
- d) for the promotion of Laminam products similar to those already purchased and marketed by the Retailer Company.

The legal bases of the processing are:

- for the purposes *under a)*, the execution of pre-contractual measures, as described in a);
- for the purpose *under b)*, the legitimate interest of the Data Controller in the full defence of their rights;
- for the purpose *under c)*, the fulfilment of legal obligations to which the Data Controller is subject;
- for the purpose *under d)*, the legitimate interest of the Data Controller in consolidating the relationship with the Retailer Company.

The processing of Personal Data may be necessary for the pursuit of purposes a), b) and c). Therefore, any failure to provide it, even in part, would prevent the completion of the registration procedure and the fulfilment of the obligations connected with its execution (hence including those relating to the operational and administrative management of the same) or any assistance activity. On the other hand, any objection to the processing of Personal Data for the purpose *under d)* does not in any way affect the registration of the Warranty, nor further related activities; in this case, the release of Personal Data is optional.

2) PROCESSING METHODS AND RECIPIENTS OF PERSONAL DATA

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

In addition, for the pursuit of the above-mentioned purposes, Personal Data may be disclosed to/known by:



- i. those authorized to process data by the Data Controller (employees/operators and collaborators);
- ii. third-party companies and professionals providing services to the Data Controller (such as, for example, insurance companies, accounting service companies, law firms);
- iii. computer technicians, only to the extent necessary to ensure the operation of computer programs and procedures instrumental to the performance of the Data Controller's activities, duly authorised;
- iv. third-party companies and professionals appointed to enforce rights, interests, claims of the Data Controller arising from the relationship with the Retailer Company and Data subjects;
- v. State administrations, public and private entities, also following inspections and audits;
- vi. persons who can access Personal Data by virtue of legal provisions or secondary or EU regulations.

The above recipients will act as data processors, autonomous data controllers or authorised 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, Data Subjects may contact the Data Controller directly by writing to the contact details indicated in par. 6.

3) TRANSFER OF PERSONAL DATA OUTSIDE THE EEA

If, in order to fulfil the purposes set out in para. 1, 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.

4) PERIOD OR CRITERIA OF PERSONAL DATA RETENTION

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. 1, lett. a): at least until the expiry of the period of validity of the Warranty;
- for the purpose indicated in para. 2, lett. b), hence for ensuring the right of defence of the Data Controller: at least until the possible exercise of the Data subjects' 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. 1, lett. c): for the duration prescribed by law;
- for the purpose indicated in para. 1, lett. d): until the exercise of the right to object by the Data subjects and in any case for a maximum period of 24 months from the registration of the Warranty.

In case of opposition, Personal Data will be deleted unless other activities are being carried out by the Data Controller that require the processing of such data; in such case, Personal Data will not be deleted but will no longer be processed for the specific purpose for which the Data Subjects have exercised their opposition (and may therefore be processed, where necessary, for the other purposes). Once the objection has been received, it may take a few days for it to be processed and then for the



Data Controller's records/systems to be updated. Unsubscribing from receiving promotional e-mails will not interrupt service communications, such as updates regarding the Warranty being relevant for the Retailer Company.

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.

5) RIGHTS OF DATA SUBJECTS

The 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	Right of rectification	Right to deletion	Right of restriction of treatment:	Right to data portability:
the Data Controller can confirm to Data subjects whether or not Personal Data concerning them are being processed and, if so, they can obtain access to their personal data;	allows the rectification/supplementation of inaccurate/incomplete Personal Data;	allows to obtain, in the cases provided for by law, the deletion of their own Personal Data;	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;	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.

Data subjects have also 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. 1, lett. b), subject to the clarification in para. 4 about personal data retention;
- in relation to the processing of their data for the purpose indicated in para. 1, lett. d), i.e. for the management of promotional contacts, to **object to** the processing at any time and without giving any reason, by clicking on the appropriate *link* at the bottom of each *e-mail* received to unsubscribe from the *mailing list*.

In addition, Data Subjects who consider that the processing of Personal Data relating to them 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).

6) DATA CONTROLLER'S CONTACTS

Laminam S.p.A., based in Fiorano Modenese (MO) via Ghiarola Nuova 258, VAT code/Tax ID. IT01969990355.



For further information, the Data Controller 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

