

NOTICE FOR PERSONAL DATA PROCESSING

under article 13 of Legislative Decree 679/2016

METALLURGICA ALTA BRIANZA S.P.A., with head office in Viale Brodolini 18- 23900 Lecco (LC), Tax Code and VAT N. 00224040139 (hereinafter, "**CONTROLLER**"), as data controller, informs you that, pursuant to art. 13 of EU Regulation 2016/679 (hereinafter, "GDPR") your data will be processed in the following manner and for the following purposes:

1. Processing Objective

The Controller will process your personal data:

- identifiers (e.g. first name, last name, company name, address, phone number, e-mail, bank and payment details) hereafter referred to as "PERSONAL DATA"

communicated by you at the time of the stipulation of the contracts for the services or performances in general of the Controller. In this notice we refer generically to your DATA, to indicate the set of data you have provided.

2. Processing Purpose

Your DATA is processed:

A) without your express consent, in accordance with the provisions of Article 6, paragraph 1, letter b, for the following Purposes:

- to conclude contracts for the services of the Controller
- to fulfil pre-contractual, contractual and tax obligations arising from our dealings with you

B) without your express consent, in accordance with the provisions of Article 6, paragraph 1, letter c, for the following Purposes:

- fulfilling obligations required by law, by a regulation, by European Union legislation or by an order of the Authority (such as in the field of anti-money laundering)
- exercise the rights of the Controller (such as the right to a fair trial)

3. How data is processed

The processing of your DATA is carried out through the procedures listed in art. 4 paragraph 2 and specifically: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your DATA is processed both on paper and electronically and/or by automated means.

The Controller will process your DATA to fulfil the Objectives as per point 2.A for the period necessary to fulfil the existing contract and in any case, for no more than 10 years from the termination of the relationship between the parties; for the Objectives as per point 2.B for the period necessary to comply with legal obligations and in any case for no more than 10 years from the termination of the relationship between the parties.

4. Accessing data

Your data may be made accessible for the purposes referred to in art. 2.A and 2.B of this notice:

- to employees and collaborators of the Controller, in their capacity as persons in charge, internal data processing delegates, system administrators or external Managers.

5. Reporting of data

Without the need for express consent, the Controller may communicate your data for the purposes referred to in art. 2.A and 2.B of this notice to:

- Surveillance bodies, judicial authorities, as well as to those individuals to whom the communication is required by law for the fulfilment of the aforementioned purposes. The above mentioned people will process the data in their capacity as autonomous data controllers.
- To third party companies or other entities (by way of indication, credit institutions, professional offices, consultants, insurance companies for the provision of insurance services, leasing companies, technical structures, etc.) that perform outsourcing activities on behalf of the Controller, in their capacity as external data processors.

Your data will not be disclosed.

6. Data transfer

Your data is stored on servers located within the European Union. In any case, it is understood that the Controller, should it be necessary, will have the right to move the servers even outside the EU. In this case, the Controller guarantees that the transfer of non-EU data will take place in compliance with the applicable legal regulations, subject to the stipulation of the standard contractual clauses established by the European Commission.

7. Providing data and refusal to answer consequences

The provision of data for the purposes referred to in art. 2.A and 2.B of this notice is mandatory. Without them, we will not be able to guarantee you the requested Services.

8. Rights of the data subject

As a data subject, you have the rights referred to in Article 15, namely the rights to:

- obtain confirmation of the existence or otherwise of data concerning you, even if not yet recorded, and their communication in intelligible form;
- obtain indication of: a) the data source; b) the purposes and methods of processing; c) the logic applied in the event of processing carried out with the aid of electronic instruments; d) the controller's personal details, managers and the designated representative details pursuant to art. 3, paragraph 1; e) the entities or categories of entities to whom or which the data may be communicated or who or which may get to know said data in their capacity as National designated representative, controller or processors;
- obtain: a) the update, correction, if interested, integration of data; b) the cancellation, anonymization, or blocking of data processed unlawfully, including data whose conservation is unnecessary in relation to the purposes for which the data were collected or subsequently processed; c) certification that the operations under letters a) and b) have been communicated, including their contents, to those whom the data were communicated or disclosed, unless this requirement proves impossible or requires the use of means manifestly disproportionate to the protected right;

- iv. object, in part or in full: a) for legitimate reasons, to the processing of your personal data, even if pertinent to the collection purpose; b) to the processing of your personal data for the purpose of sending advertising materials or direct sales or for carrying out market research or commercial communication surveys, through the use of automated calling systems without the intervention of an operator, by e-mail and/or by traditional marketing methods such as telephone and/or paper mail. Please note that the aforementioned right of objection of the person concerned, set out in point b), for direct marketing purposes by means of automated methods, is extended to the traditional ones and that in any case the right of the person concerned, to exercise his/her right of objection, even if only in part, remains unaffected. Consequently, the party concerned may decide to receive only communications by traditional means, or only automated communications, or neither.

Where applicable, you are also entitled to the following rights:

- i. Right of rectification (art. 16)
- ii. Right to erasure («right to be forgotten») (art. 17)
- iii. Right to restriction of processing (art. 18)
- iv. Notification obligation regarding rectification or erasure of personal data or restriction of processing (art. 19)
- v. Right to data portability (art. 20)
- vi. Right to object (art. 21)
- vii. as well as the right to complain to the Guarantor Authority.

9. Procedure for the exercising of rights

You may at any time exercise your rights by sending:

- a registered letter with advice of receipt to METALLURGICA ALTA BRIANZA S.P.A. Viale Brodolini 18– 23900 Lecco (LC)
- an e-mail to mab@steelgroup.com
- by accessing the website of the Privacy Guarantor <http://www.garanteprivacy.it>

10. Controller, manager and appointees

The data controller is **METALLURGICA ALTA BRIANZA S.P.A.**

The updated list of data processors is kept at the Controller's Headoffice.