PRIVACY POLICY pursuant to GDPR 679/2016

Holder of the treatment: Metallurgica M.G. S.r.l. located in Mazzano (BS) in Via Olivetti 5/A.

pursuant to articles 4 and 28 of the legislative decree 30 June 2003, n. 196 - Privacy Code (hereafter "Code") and articles 4, n. 7) and 24 of EU Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data (hereinafter, "Regulation") pursuant to article 13 of the Code and of the Regulation informs that for the establishment and execution of relationships with the current user, you have personal data (personal and tax).

In order to comply with the obligations established by the Code and by the EU privacy laws in relation to your data, we invite you to take note of the following information and to consent to the processing of personal data that our company will acquire.

1. INFORMATION COLLECTED

We only collect information that is necessary, relevant and appropriate for the purpose for which it is provided. The information we collect may include some or all of the following:

- Identity data: name, surname, username or identifier and similar title.
- Contact information: billing address, delivery address, email address and telephone numbers.
- Financial data : bank account and payment card details collected solely for the purpose of completing the purchase.
- Transaction data: payment details and other details about the products and services purchased or sold.
- Profile data: purchases or orders made, any social profiles (if applicable), preferences, feedback, communications and responses to internal surveys, passwords and username, if applicable (customer portal).
- Usage data: information on how the website, products and services are used.
- Marketing and communication data: preferences in receiving marketing communications and third parties and communication preferences.
- Technical data: Internet Protocol (IP) address, access data, browser type and version, time zone setting and browser plug-in location, types and versions, operating system and the platform and other technologies on devices used to access corporate websites.

2. USE OF INFORMATION

Only the information necessary for the following purposes is processed:

1. Operational management and purposes strictly connected to it for access to the website.

The Company collects contact data, financed and use of the website to allow the user to be able to access the Personal Area, where present and proceed with the orders of the products and / or services concerned. Prerequisite for processing : fulfillment of contractual obligations.

The provision of data is mandatory to respond to your requests; otherwise we will not be able to take it.

2. Customer Satisfaction surveys

The Company may use the contact details for conducting surveys aimed at measuring the level of satisfaction (so-called customer satisfaction) of the service provided.

<u>Prerequisite for processing</u> : consent. failure to provide it does not have consequences on contractual relationships. Consent can be revoked at any time by writing to the following address: info@metallurgicamg.com

3. Marketing

The Company may process contact data for marketing and advertising communication purposes, aimed at informing the User about sales promotional initiatives, carried out through automated contact methods (e-mail, sms and other massive messaging tools, etc.) and traditional methods of contact (for example, telephone call with operator) or for market research and statistical surveys.

Prerequisite for processing : consent. Failure to provide it does not have consequences on contractual relationships.

Consent can be revoked at any time by writing to the following address: info@metallurgicamg.com

4. Compliance with legally binding requests to fulfill a legal obligation, regulations or provisions of the judicial authority, as well as to defend a right in court

The Company collects contact data to fulfill a legal obligation and / or to defend its right in court <u>Prerequisite for processing</u> : legal obligations, which the Company is obliged to comply with.

3. SHARING

We do not share information with third parties, however, we may from time to time communicate the information to the following categories of companies or organizations to which we pass the responsibility of managing services on our behalf: assistance service providers, customer contact centers, agencies and consultants direct marketing, market research and market analysis service providers, legal advisors and other professionals.

We work to ensure that all third-party partners who manage information comply with data protection legislation and protect information just as we do. We communicate to them only the personal information STRICTLY necessary to provide the service they are undertaking on our behalf.

We will anonymize the information or use specific aggregated data sets where possible.

4. STORAGE TERMS

We do not store personal information in an identifying format for longer than necessary.

For customers or suppliers, we keep personal information for a longer period than the treatment of potential customers / suppliers.

In the case of an ongoing relationship (for example a customer), we retain personal information for 10 years from the date of the last operation carried out, in order to establish, bring or defend any legal complaints in court.

Promotional and marketing information will be kept for a maximum period of 24 months.

5. FILING

The personal data we collect may be transferred to, and stored in, a destination outside the European Economic Area (EEA), for the purposes described above. We will take all steps reasonably necessary to ensure that personal data is processed securely and in accordance with this Privacy Policy and data protection legislation. To the extent that it is necessary to transfer personal data outside the European Union, we will ensure that adequate protective measures are taken to protect the privacy and integrity of such data, including the provisions on the models of the European Union pursuant to Article 46 "Transfer subject to adequate guarantees".

6. COOKIES

Cookies are text files that identify the computer (through the so-called IP address) on our server. For information on the reasons why we use them, refer to the "How we use the information we collect" section of this Privacy Policy. We do not use the IP address as a means of identifying the user. Generally, there is the possibility to set the computer to accept all cookies, to be informed when a cookie is issued or not to receive cookies at any time, this is possible through the internet browser. With most browsers, this function can be reached via the 'tools' menu (eg Internet Explorer), 'edit', or 'task'. If there are problems finding this area, the "help" function within the browser will be able to provide assistance. You can also find more detailed information on cookies and how to manage them on http://www.allaboutcookies.org.

The refusal of cookies could prevent the correct functioning of the site or even prevent access to certain areas.

6.1. HOW DO WE USE COOKIES?

Depending on the function and purpose of use, cookies can be classified into technical cookies, analytical cookies, profiling cookies. All cookies are divided into proprietary cookies, installed directly by the site operator and in third-party cookies, installed through the site by third parties.

Based on the characteristics and use of cookies, we can distinguish several categories:

 navigation cookies on the website trace the path of the cookies (so-called "click stream" activity, or the recording of the paths followed by visitors to a site in the passage from one page to another) without being able to know or identify the user, in order to collect statistical data on the site such as, for example, the pages visited, downloaded, and t c.

We reiterate that none of this information is associated with you individually. Cookies do not acquire your personal email address or any of your private information. The information obtained from the tracking of cookies is evaluated only overall. The log files of the Web server are also used to count visitors and evaluate the technical capabilities of our site in order to facilitate navigation on the site and to make its pages more useful to users. We collect information about site traffic, but not about individual visitors .

2. session cookies are strictly necessary to provide you with the services available through our website and to use some of its features.

Since these cookies are strictly necessary, it is not possible to reject them without affecting the functioning of our website, but it is possible to block or eliminate them by changing the browser settings and imposing the blocking of all cookies on this website.

- **3.** Google Analytics cookies collect information that is used in aggregate form to help us understand how our website is used or the effectiveness of our marketing campaigns or to help us customize the site in order to improve your experience.
- **4. profiling cookies** create user profiles and are used to send advertising messages in line with the preferences expressed by the user while browsing the web :

a. The cookies collected for the purposes listed above can be communicated to the competent subjects in charge of managing the site for the performance, even partial, of the activities related to the assignment.

b. For all cookies other than technical cookies, the user's express consent is required the first time he visits the site. Consent is traced on subsequent visits, however the user always has the possibility to revoke all or part of the consent already expressed.

6.2. DURATION

Some cookies (session cookies) remain active only until the browser is closed. Other cookies (persistent cookies) "survive" when the browser is closed and are also available on subsequent visits by the user and their duration is set by the server at the time of their creation with a pre-established expiration date.

The setting can be defined specifically for different websites and web applications. Furthermore, the most common browsers allow you to define different settings for various types of cookies.

It is possible to set the browser so that it is notified in case of attempts to insert cookies, limitation or complete refusal.

7. DATA SUBJECT'S RIGHTS

The interested party will be able to assert their rights, as provided for in articles 15-23 GDPR in particular:

- Request a copy of the information we have in our possession;
- Correct and update your information;
- Withdraw consent;
- Right to object and request the deletion of data or the limitation of use, if there are no legitimate reasons to continue using and processing your information and / or in the absence of consent to direct marketing activities;
- Right to data portability;
- Right to lodge a complaint with the competent supervisory authority (Privacy Guarantor).

You can exercise the above rights and / or manage the information by contacting us at the following references:

Post: Via Olivetti 5/A - 25080 Mazzano (BS)

Email: info@metallurgicamg.com

In the case of a request for access or information, we inform you that, if the request is unfounded or excessive, we can charge a fee or refuse to act.

8. CHANGES TO THIS PRIVACY POLICY

Metallurgica M.G. S.r.l. reserves the right to modify the content, in part or completely, also due to regulatory updates. The updated version of this information will be published on the website , therefore we invite you to visit this section regularly.