



## COSTUMER POLICY

Pursuant to Article 13 of the European Regulation 679/2016 (GDPR – General Data Protection Regulation) concerning the following processing of personal data

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Dear Customer,

pursuant to Article 13 of the Regulation (EU) No. 2016/679 – General Data Protection Regulation (hereinafter: the “**GDPR**”), Gessi s.p.a., in the person of its legal representative pro tempore, as the data controller (hereinafter: the “**Controller**”), informs all customers that the personal data collected during the customer relationship will be processed in compliance with the provisions contained in the GDPR, the Italian Legislative Decree 196/2003 as amended by the legislative decree 101/2018, and the national and EU legislation in force from time to time on the protection of personal data, as better described in this policy.

### DATA CONTROLLER

The data controller is Gessi s.p.a. with registered office in Parco Gessi, 13037 Serravalle Sesia (Province of Vercelli, Italy), Tax Code and VAT N. 02235360027, who can be contacted at the following e-mail address: [gessi@pec.gessi.it](mailto:gessi@pec.gessi.it)

### PROCESSED DATA

The Controller may process the personal data of the customer (if he/she were a natural person) and/or of his/her employees, directors, representatives, collaborators and other contractors such as, for example:

- first and last name of the customer and the customer's contact persons
- addresses
- telephone and e-mail addresses
- profession, etc.

collected by the Controller (“Data”).

### LEGAL BASIS AND PURPOSE OF PROCESSING

Data are collected and processed by the Controller on the following legal bases and for the following purposes:

- Article 6 paragraph 1 b) of the GDPR: all pre-contractual activities (such as sending offers, credit and customer management, etc.) and related to the execution of a contract between the customer and Gessi s.p.a;
- Article 6 paragraph 1 c) of the GDPR: fulfilment by the Controller of legal obligations imposed by industry regulations (administrative, tax, accounting, etc.), national and European regulations, applicable to the existing relationship and/or activities connected with and/or instrumental to the relationship between the Controller and the Customer;
- Article 6 paragraph 1 f) of the GDPR: legitimate interest of the Controller related to the establishment, exercise or defence of a right in all competent forums, including out-of-court procedures.

### NATURE OF DATA PROVISION

The provision of Data for the purposes indicated in the preceding paragraph is optional, unless otherwise specified by the Controller, for example by marking mandatory Data in the forms with an asterisk. Failure to provide Compulsory Data may result in the impossibility of fulfilling the Controller's contractual obligations.

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### DATA RECIPIENTS OR POSSIBLE CATEGORIES OF DATA RECIPIENTS

Personal data will be processed by the Controller, and by persons strictly authorised by it. Data may be disclosed to the following categories of third parties:

- (I) external natural and/or legal persons authorised to process data by a specific agreement with the Controller (Article 28 GDPR) or as autonomous data controllers (Article 4, paragraph 1, no. 7 GDPR), also by virtue of the law;
- (II) parties to whom such communication must be made in order to fulfil or require the fulfilment of specific obligations laid down by laws, regulations and/or national and EU legislation, such as public agencies and other public authorities;
- (III) other subsidiaries and/or associates and/or affiliates of the Controller that are part of the “Gessi Group”.

### DATA TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

As part of the management of the relationship with the Controller, it may be necessary to transfer the Data to countries outside the EU and/or to international organisations in order to achieve the purposes of the processing. In such cases, the Controller will adopt all appropriate security, protection and confidentiality measures aimed at protecting the Data, in compliance with the privacy regulations in force.

### RETENTION PERIOD

Your data will be kept for the time necessary to achieve the purposes for which they are processed and, thereafter, within the terms provided for by any applicable regulations.

Criteria for defining retention periods:

- we keep the Data for the period of time during which a contractual relationship with the customer is ongoing;
- check whether archiving is necessary, depending on our legal situation (e.g. with regard to limitation periods, procedures or checks by authorities); and
- check whether we are obliged by applicable law to keep the Data for a further period (e.g., in the case of purchase transactions we may be obliged to keep records of your transactions for a certain period of time).

### DATA SUBJECT RIGHTS AND HOW TO EXERCISE THEM

The customer may in any case and at any time exercise the following rights:

- access to personal data, rectification or deletion of personal data, restriction of processing, objection, portability under Articles 15-20 of the European Regulation 679/2016 by sending an e-mail request to [privacy@gessi.it](mailto:privacy@gessi.it)
- to lodge a complaint with the Italian Data Protection Authority (see website: [www.garanteprivacy.it](http://www.garanteprivacy.it)).

### EXISTENCE OF AN AUTOMATED DECISION-MAKING PROCESS

The processing does not involve automated decision-making process.

Last updated: June 2024

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