

INFORMATION ON THE PROCESSING OF PERSONAL DATA OF CUSTOMERS/SUPPLIERS
(ART. 13, 14 REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL)

Dear Customer/Supplier,

GAMMASTAMP S.p.A. (hereinafter the "**Company**" or "**The Data Controller**"), as data controller wishes to inform you, pursuant to Articles 13 and 14 of European Regulation 679/2016 on the protection of personal data ("**Regulation**") of the following.

1. Type of personal data

The data transmitted by you in relation to your personnel involved in the execution and management of contracts with the Company, including name, surname, contact details, email addresses, professional qualifications where relevant, any data relating to wages and contributions paid and the regularity of contributions in relation to the personnel you employ to provide services at the Company, when such data are necessary to carry out checks on compliance with the rules on the protection of workers included in tender contracts, supplied directly by you, they will be processed by the Company in accordance with the Regulation and national legislation, including any measures issued by the Control Authority, where applicable.

In the case of suppliers who are natural persons, in addition to the data highlighted above, data relating to invoicing and payments (including VAT number and tax code), bank data, registration in registers or registers, economic-financial data (e.g. financial statements) may also be processed.

2. Purposes of the processing

The processing of the data of the Interested Parties is carried out by the Company in the performance of its economic and commercial activities for purposes related to the possible selection, establishment, management and execution of the contractual relationship (including the management of the pre-contractual relationship). In particular, the data will be processed for the fulfilment of legal obligations (e.g. tax and accounting obligations, obligations deriving from the regulation of tender contracts and health and safety at work); for the opening of the suppliers' registry; the administrative management of contracts, including the management of payments and invoices; obligations aimed at the supply of goods and services, as well as the management of any disputes, the performance of internal controls (safety, productivity, quality of services, asset integrity), certification. The data of the Interested Parties may also be processed for periodic activities to assess the existence of the ethical and legal requirements established by the Company in its Code of Conduct and within the scope of audits, also at your premises, of quality, process, product or sustainability. For the above-mentioned purposes, it is not necessary to acquire specific consent as the Company may avail itself of the exemptions set forth in Articles 6.1 b), 6.1 c) of the Regulation.

In the case of suppliers who are natural persons, for the processing of data of an economic-financial nature, such as commercial information and financial statements, the Company avails itself of the exemption of Article 6.1 f) (the Company's legitimate interest in verifying the economic-financial).

3. Nature of the provision and methods of processing

The provision of the data of the Interested Parties is necessary and, in the absence of this, it will not be possible to establish any business relationship, to properly perform pre-contractual and contractual obligations or, where a contractual relationship has already been established, to fulfil the obligations and commitments arising therefrom.

Any personal data of the Interested Parties will also be collected through the video surveillance system, present in the Bianzè plant, in the access and exit areas of the premises and within the perimeter, where the Interested Parties are present, in accordance with the information notice on



GAMMASTAMP S.p.A.

a socio unico "Direzione e coordinamento
ex art. 2497 c.c.: Tecno V S.p.A."

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DIREZIONE, SEDE AMMINISTRATIVA
E STABILIMENTI:
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SEDE LEGALE:
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Cap. Soc.€ 6.200.000 int. vers.

data processing for video surveillance purposes, available at the porter's lodge.

The data of the Interested Parties will be processed by the Company and its authorised personnel, with electronic and manual systems in accordance with the principles of fairness, loyalty and transparency provided for by the applicable legislation on the protection of personal data and protecting the confidentiality of the person to whom the data refer by means of technical and organisational security measures to ensure an adequate level of security (for example, preventing access to unauthorised persons except in cases required by law, or the ability to restore access to the data in the event of physical or technical incidents).

4. Data retention

Data will be retained in compliance with applicable data protection regulations for as long as is necessary to fulfil the above-mentioned purposes. In particular, the data shall be kept for the entire duration of the contractual relationship and also after the termination thereof in compliance with civil and tax obligations (e.g. civil obligations to keep invoices and company documentation for at least 10 years).

The data acquired during the selection process, if no subsequent contractual relationship with the Company arises, will be kept for a period of 5 years from their acquisition.

Data collected by the video surveillance system will be stored for 24 hours and subsequently overwritten by the system.

5. Communication, dissemination and transfer of data

Without prejudice to the communications carried out in fulfilment of legal and contractual obligations, the data may be communicated to tax or legal consultants, collaborators of the Company, credit institutions, entities and public administrations where necessary, as well as to parties legitimated by law to receive such information, Italian and foreign judicial authorities and other public authorities, for purposes connected with the fulfilment of legal obligations, or for the fulfilment of obligations assumed and arising from the contractual relationship, including for the need to defend oneself in court. These parties act as autonomous data controllers.

Contact data may be communicated for occasional needs to other customers and/or suppliers of the Company, for example if they have to cooperate with such subjects for the purpose of fulfilling contractual obligations.

The Company also uses third parties to provide certain services that involve the processing of personal data, such as suppliers of replacement storage services or quality, process and product audit services. These subjects act as data processors, on the basis of specific and adequate instructions in terms of processing methods and security measures indicated in specific contractual documentation. The complete and updated list of the subjects that process personal data in their capacity as data processors is available upon request from the Company at the contacts indicated below.

The data may be communicated to other group companies, including subsidiaries and affiliates based in the European Union (an updated list of which is available on the institutional website www.gammastamp.com), where necessary for internal administrative and group coordination purposes or where they must cooperate in the performance of contractual obligations. Personal data will not be disseminated.

6. Rights of data subjects

In relation to the data processing described herein, data subjects may exercise the rights provided for by the Regulation (Articles 15-21), including:

- receive confirmation of the existence of their personal data and access to their content (access



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rights);

- update, modify and/or correct your personal data (right of rectification);
- to request the deletion or restriction of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or otherwise processed (right to be forgotten and right to restriction)
- except where the processing is carried out in compliance with a legal obligation, to object to the processing, in the cases provided for in the Regulation (right to object);
- withdraw consent, where given, without prejudice to the lawfulness of the processing based on the consent given before the revocation;
- receive a copy of the data in electronic format concerning him/her made in the context of the contract and request that such data be transmitted to another data controller (right to data portability).

In order to exercise these rights or to request further information regarding this policy, the Data Subject may contact the Data Controller by sending an e-mail to privacy@gammastamp.com.

The Data Subjects may also lodge a complaint with the Supervisory Authority in the event of violation of personal data protection regulations.

7. Identity and contact details of the Data Controller

The Personal Data Controller is GAMMASTAMP S.p.A. with registered office in Via Ettore de Sonnaz, 19 - Turin, Italy, telephone: +39 0161 428135, in the person of the Legal Representative.

The Personal Data Controller invites its Customers and Suppliers to inform the Data Subjects (i.e. directors, employees and collaborators whose data the Company comes into possession for the purposes of the execution of the contract) about the content of this Information Notice.

The Personal Data Controller

Audisio Junior Vittorio



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