

This privacy policy document describes the purposes and methods of processing the personal data of customers (hereinafter "data subjects") of SOLEMA S.R.L.

1) Data Controller of the personal data processing

The Data Controller of their processing is SOLEMA S.R.L. - Registered office: Via Carducci, 18 – 24066 Pedrengo (Bg) - Phone 035/654111 – Fax. 035-654112 - VAT number/Tax Code IT01378420168 - e-mail address: info@solema.it - Web www.solema.it Web <http://www.solema-graphics.com/> <http://www.solema-boards.com/>.

2) Data protection officer

Pursuant to art. 37 of Reg. (EU) 2016/679, SOLEMA has decided not to appoint a Data Protection Officer (DPO) as it is not a public body and, as its main activity, it does not carry out regular and systematic monitoring of large-scale data, including data referred to in Articles 9 and 10.

3) Processing purpose, method and place

The data processed by SOLEMA S.R.L. in relation to its customers will be regularly collected and processed:

- a) For purposes concerning the contract established between the parties;
- b) For purposes of a civil, fiscal and accounting nature;
- c) To fulfil obligations laid down by law, regulations, community legislation or by an order of the Authorities (such as for anti-money laundering);

Only with your specific and distinct consent will your data be processed for:

- d) promotional, marketing, sales activities, references, invitations to events, fairs and seminars, sending newsletters, etc.

Personal data are processed by automated and manual tools for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures are observed in order to prevent the loss of data, their illegal or incorrect use and any unauthorised access.

The processing connected to the Services takes place at the offices of SOLEMA S.R.L. and at the headquarters of the company's processing service providers, and is only handled by technical personnel specifically appointed as data supervisor and/or processor or by persons responsible for occasional maintenance operations.

4) Categories of personal data and recipients, scope of communication and dissemination

SOLEMA S.R.L. collects the personal data of customers required to provide the Services referred to in the existing contract, including by way of example, but not limited to: company name, telephone number, e-mail address and Tax code, VAT number, bank details, etc.

The data may be disclosed:

- to Public Administrations, for carrying out their institutional functions, within the limits established by the law and by regulations;
- to Companies responsible for debt collection;
- to insurance Companies;
- to Accounting firms and data processing companies for tax-accounting and consultancy activities;
- to Lawyers for legal assistance in case of disputes concerning the contract;
- to potential clients to facilitate the conclusion of agreements;
- to consulting companies, professionals and entities operating for **SOLEMA** in the various sectors;
- to banking institutions and financial companies for making use of financial services, banking, etc.;
- to other bodies, institutions, companies, professionals for the purposes connected and functional to the entrusted assignment;
- to the internal and external staff in charge of processing and creating databases, archiving documents and correspondence;
- to internal and external carriers

These subjects will process the data in their capacity as independent data controllers.

The data in question could be disseminated via the website. If deemed necessary, explicit consent will be requested.

5) Nature of data provision and consequences of refusing to answer

The provision of data for the purposes referred to in Articles 3 a) b) c) is mandatory. In their absence, we will not be able to guarantee the Services provided for in the contract. The provision of data for marketing purposes specified in point 3 d) is optional and does not affect the conclusion of the contract and the provision of the service. You can therefore decide not to provide any datum or to subsequently deny the possibility of processing data already provided.

6) Transfer abroad

Data could be transferred abroad to the headquarters of **SOLEMA USA INC.** 315, Glenn Street P. O. Box 472 Crawfordsville 47933 Indiana USA. Data may be transferred following the decision of the European Commission dated 12 July 2016 which adopted the agreement regulating the transfer of data between the European Union and the USA (so-called Privacy Shield).

7) Periods of retention

Personal data processed for pre-contractual/contractual purposes are processed for the time strictly necessary to achieve the purposes for which they were collected and may be stored for a period of 10 (ten) years in order to manage and fulfil the requests of the competent authorities, handle any legal and/or out-of-court disputes, and manage and respond to any claims for damages. Based on the indications of the Data Protection Authority for the protection of personal data, the data processed for marketing purposes may be stored for a period of time not exceeding 24 (twenty-four) months from their collection. Subsequently, such data must be irretrievably deleted or made anonymous. Without prejudice, in all cases and according to the specific purpose of processing and type of data processed, to the possibility of their further retention in compliance with any legal obligations or for the protection of hypothetical rights in court and for managing possible out-of-court disputes.

8) Data subjects' rights

In your capacity as a data subject, you have the rights referred to in art. 15 GDPR and precisely the right:

- I. to obtain the confirmation of the existence or not of personal data concerning you, even if not yet recorded, and to its communication in an intelligible form
- II. to obtain indication:
 - a) of the source of the personal data; b) of the purposes and methods of the processing; c) of the logic applied in case of processing carried out with the aid of electronic instruments;
 - d) of the identification details of the data controller, data supervisors and of the designated representative pursuant to art 3, paragraph 1, GDPR; e) of the parties or categories of parties to which the personal data may be communicated or who may come into its possession as designated representatives of the State, processing officers or processors;
- III. to obtain:
 - a) the updating, rectification or, when interested, the integration of the data; b) the cancellation, the transformation into anonymous form or the blocking of data unlawfully processed, including data which has no need to be kept in relation to the purposes for which it was collected or subsequently processed; c) the confirmation that operations as per letters a) and b) have been notified, including as concerns their contents, to those to whom the data was communicated or disseminated, excepting where this should prove impossible or should involve the use of means manifestly disproportionate to the protected right;
- IV. to oppose, in whole or in part:
 - a) for legitimate reasons, to the processing of personal data concerning you, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communications, through the use of automated call systems without the intervention of an operator by e-mail and/or through traditional marketing methods by telephone and/or paper mail.
- V. It should be noted that the right of opposition by the data subject, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones as well, without prejudice to the possibility by the data subject to exercise the right of opposition, including partial. Therefore, the data subject can decide to only receive communications using traditional methods or only automated communications or neither of the two types. Where applicable, he/she also possesses the rights laid down in Articles 16-21 GDPR (Right of rectification, right to be forgotten, right to processing restriction, right to data portability, right of opposition), as well as the right to lodge a complaint to the Data Protection Authority.

9) Procedure for exercising the rights

Requests should be sent to the Data Controller, without specific formalities, by sending a notice to the e-mail address solema@aloorapec.com.

10) Right to lodge a complaint

The data subject has the right to lodge a complaint to the Personal Data Protection Authority concerning a possible violation of the regulations regarding the protection of personal data and to request a verification by the Authority for the Protection of Personal Data located in Piazza di Monte Citorio no 121 - 00186 Rome, Fax: (+39) 06.69677.3785 Telephone switchboard: (+39) 06.696771 E-mail: garante@gpdp.it pec (certified email address): protocollo@pec.gpdp.it.

11) Data source

The data in question were acquired mainly from the data subject. However, some may be acquired from publicly accessible sources.

CONSENT BY THE DATA SUBJECT FOR PROCESSING PERSONAL DATA

The data subject _____ authorises the processing of data for

- the purposes referred to in art. 3 d) i.e. for promotional, marketing, sales activities, references, invitations to events, fairs and seminars, sending newsletters, etc.

YE

NO

Stamp and Signature _____