

PRIVACY NOTICE PURSUANT TO SEC. 13 OF THE EU REGULATION 679/2016

Subjects: clients, suppliers, possible clients, possible suppliers, clients and suppliers' representatives.

The company Zefiro S.r.l. with headquarters in Pistoia (PT), Via di Montebuono 23, 51100, tax code and VAT no. 01449860475, (hereinafter, the **Company** or **Zefiro**), in its quality of data controller, informs you regarding the processing of your personal data collected during the commercial relationship with the Company, pursuant to sec. 13 of the European Regulation (EU) 2016/679 (hereinafter, the **GDPR**).

1. DATA CONTROLLER

Zefiro S.r.l. is the data controller of your personal data. The Company can be contacted for matters related to the data processing by sending an email to privacy@replast.it.

2. SOURCE OF DATA AND PURPOSES OF THE DATA PROCESSING, LEGAL BASIS, DATA DISCLOSURE AND MEANS OF PROCESSING

The personal data are collected by Zefiro directly from you, in the context of the conclusion and execution of the commercial relationship with the Company and for the following purposes:

- a) provision of the services covered by the commercial relationship;
- b) suppliers management;
- c) client management;
- d) withdrawals management and goods delivery;
- e) purposes connected to the requirements established by laws, regulations and EU legislation, as well as by any provisions issued by public bodies;
- f) purposes of contract management, statistics, anti-money laundering, credit protection;
- g) participation in market surveys carried out through questionnaires in relation to services and/or products purchased (if customer of the Company);
- h) delivery of newsletter in relation to Zefiro's products and/or services similar to those already purchased by you (if customer of the Company).

The legal basis for data processing is the execution of commercial relationships (for the purposes under lett. a) - f).

The legal basis for data processing is the legitimate interest of Zefiro (for the purposes under lett. g) and h).

In fact, we would like to remind you that on the basis of the regulations in force, the Company may use the e-mail addresses that you provide when you purchase our products and/or services in order to participate in market surveys and offer you

products and/or services similar to those purchased by you (purposes referred to in letters g) and h)). However, if you do not wish to receive these communications, you may notify the Company at any time, using the address provided in paragraph 1 of this privacy policy above or using the link on the email communications you receive. The Company, in this case, will stop the aforementioned activity without delay. The data collection and processing shall be carried out through manual, computerized and telematics tools and with logic strictly related to the abovementioned purposes and, in any case, so as to guarantee the confidentiality and security of the data.

3. DATA DISCLOSURE AND CONSEQUENCES OF ANY REFUSAL

The provision of the aforementioned data is optional. However, any refusal to provide the data for the purposes referred to under lett. a) - f) of paragraph 2 shall make it impossible to execute the commercial relationship and fulfill the relevant legal obligations. Any opposition to the processing for the purpose indicated referred to under lett. g) and h) of paragraph 2 shall not lead to any consequence, subject to the impossibility of receiving market questionnaires relating to the Company's products and services of the same nature as those already purchased and to be informed about Zefiro's products and services already purchased by you.

4. DATA RETENTION PERIOD AND DATA STORAGE LOCATION

Any personal data collected for the purposes referred to under lett. a), b), c), d) and f) of paragraph 2 shall be retained for the entire duration of the commercial relationship with the Company; subsequently, such data will be stored for a period of time not exceeding the statutory limitation period.

Any data collected for the purposes of processing indicated under point 1 lett. g) shall be retained until you object to the receipt of market questionnaires relating to the Company's products and services of the same nature as those already purchased or used, except for cases where the data are also processed for other legitimate purposes, including the case in which it is necessary to retain the data in order to provide you a service, to defend the rights of Zefiro in relation to any disputes that are on-going at the time of the request, or upon formal request from public authorities. Any personal data collected for the purpose referred to under lett. h) of paragraph 2 shall be retained until you withdraw your consent, or you request the deletion of your data, without prejudice of any exceptional needs to retain the data to exercise or defend Zefiro's rights or upon request of any public Authorities.

Your data shall be stored within the European Union. Your data will not be transferred outside the European Union.

5. RECIPIENTS OF PERSONAL DATA

Subject to the limitation of purposes indicated above, your personal data may be disclosed to the following categories of subjects:

- a) parties that carry out data processing as part of the provision of administrative services, accounting consultancy or other services, as it may be necessary for the fulfilment of the obligations established under the relevant contracts;
- b) parties that carry out data archiving and data entry activities;
- c) parties that provide debt collection services;
- d) Public Authorities, in order to fulfill legal obligations;
- e) Agents and brokers;
- f) Zefiro's employees, collaborators or consultants.
- g) Subjects that carry out freight service.

6. DATA SUBJECT RIGHTS

Under the GDPR, you are entitled to exercise the following rights:

- a) access your personal data;
- b) obtain a copy of the personal data supplied by you (e.g. portability);
- c) request the rectification of your data stored by Zefiro;
- d) limit the processing of your data or oppose to any further processing;
- e) request the deletion of personal data, where Zefiro has no longer a legitimate legal basis for further processing;
- f) oppose to any data processing carried out on the basis of a legitimate interest pursued by Zefiro;
- g) the right to lodge a complaint before the competent Authority for the Protection of Personal Data.

In order to exercise the abovementioned rights, you can send a request to Zefiro at the email address indicated under paragraph 1 above.