



## Privacy Notice for the Processing of Customers' Personal Data

In application of the GDPR - EU Regulation no. 679/2016 and pursuant to the Personal Data Protection Code - Legislative Decree 30 June 2003, no. 196, as amended by Legislative Decree 10 August 2018, no. 101 - Provisions for the adaptation of national legislation to the provisions of Regulation EU 2016/679.

In compliance with the regulations set for the protection of personal data processing, We inform you that Tubi Italflex S.r.l. S.B. is in possession of Your personal data which will be processed in relation to commercial relationships currently in place or under negotiation.

### DATA CONTROLLER

The Data Controller is: Tubi Italflex S.r.l. S.B., with registered office at via Monte Nero 31/37-20008 Bareggio MI in the person of the Legal Representative Corrado Sangalli.

**Privacy Contact Person:** For the exercise of rights, the Privacy contact person is Mr. Corrado Cantagalli, contactable via email at the address [c.cantagalli@tubi-italflex.it](mailto:c.cantagalli@tubi-italflex.it).

### CATEGORIES OF PROCESSED DATA

The information we process may include:

- Personal data such as personal details and/or address.
- Contact data as collected in relation to the provision, actual or only proposed, of our services.
- Data derived from identity documents.
- Correspondence and communications exchanged.
- Data relating to complaints or requests for information by You.
- Public domain data available at the tax Revenue Agency and/or Chamber of Commerce.
- Information relating to regulatory investigations or litigation to which You are or have been subject.

**Minimization Note on Identification Data** The Data Controller declares that the data derived from identity documents are processed exclusively as strictly necessary for the fulfillment of legal and contractual obligations (Purposes A and B).

In compliance with the principle of minimization:

- A digital or paper copy of the complete identity document including photos or signatures is **not retained**, unless integral retention is required by a specific rule of law e.g., anti-money laundering, fiscal, or administrative obligations imposing the archiving of the original document.

**Tubi Italflex S.r.l. S.B.**

Via Monte Nero, 35 · 20008 - Bareggio (MI) · Italy · tel.: +39 02 931588.1 · fax: +39 02 93169269  
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- In all other cases, only the essential personal data necessary for the unique identification of the Customer or their Legal Representative/Designee are extracted and retained.

### PURPOSES OF PROCESSING AND LEGAL BASIS

The processing of Your personal data is necessary for the following purposes and is based on the corresponding legal bases, excluding consent as a basis for the execution of the contract:

#### A. Execution of contractual and pre-contractual obligations

- **Legal Basis:** Performance of a Contract.
- **Nature of Provision:** Mandatory. Refusal prevents the establishment or continuation of the contractual relationship.

#### B. Fulfillment of legal and fiscal obligations

- **Legal Basis:** Legal Obligation.
- **Nature of Provision:** Mandatory. Refusal makes the relationship illicit.

#### C. Management of commercial relationship and defense of rights

- **Legal Basis:** Legitimate Interest.
- **Nature of Provision:** Optional, but necessary for the Controller.

**CLARIFICATION ON THE LEGAL BASIS OF LEGITIMATE INTEREST** The Controller declares that the processing based on Legitimate Interest (Purpose C) is necessary for the effective conduct and protection of its business. This interest has been the subject of a specific Balancing test and is deemed prevalent. The data subject retains the **Right to Object** at any time for reasons connected to their particular situation.

### DATA RETENTION

The retention period is distinct based on the purpose:

- **Legal/Contractual Purpose (A, B, C):** The information will be retained for the entire duration of the established contractual relationships and, subsequently, for the time strictly necessary for the fulfillment of all legal requirements in particular, **10 years** from the cessation of the relationship for fiscal and civil purposes. They will be retained beyond such term only in case of ongoing litigation.
- **Commercial/Marketing Purpose:** Not foreseen by the Controller in this policy.

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### COMMUNICATION AND TRANSFER OF DATA

**A. Recipients of the data** Personal data may be communicated exclusively to third parties providing services necessary for the indicated purposes (for example: IT and cloud services, professional consultants, administrative, banking, and tax services). Such subjects operate as **Data Processors**, based on contracts compliant with the GDPR, and adopt adequate technical and organizational measures to guarantee data protection.

**B. Transfers to third countries** Personal data are processed **entirely within the European Union**. No transfers to third countries nor access by subjects located outside the European Economic Area are foreseen.

### AUTOMATED DECISION-MAKING PROCESSES AND SECURITY

**A. Automated Decision-Making Processes:** Your personal data are not subject to any entirely automated decision-making process, including profiling.

**B. Security:** Suitable technical and organizational security measures have been prepared. Access to Your personal data is limited exclusively to authorized personnel, held to the obligation of confidentiality.

**C. Management of Data Breaches:** The Controller undertakes to notify the event to the Supervisory Authority Garante for the protection of personal data within **72 hours**, where required by the regulation, and to communicate the breach to the data subjects if there is a high risk to their rights and freedoms.

### DATA PROTECTION RIGHTS

You have the right to exercise at any time the following rights provided by the GDPR:

- Right of Access and Rectification.
- **Right of Erasure (Right to be forgotten).**
- Right to Object to processing where based on Legitimate Interest.
- Right to Object to automated decisions/profiling.
- Right to Limitation of processing.
- Right to Data Portability.
- Right to Withdraw Consent only for processing based on Your consent.

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### Modalities for Exercising Rights and Complaint

To exercise Your rights, contact the Privacy contact person Corrado Cantagalli at the address [c.cantagalli@tubi-italflex.it](mailto:c.cantagalli@tubi-italflex.it).

### CONTACT INFORMATION

The Italian DPA is based only in Rome. **Address:** Piazza Venezia 11 - 00187 Roma (Italy)

Phone: +39 06.696771 Email account: [protocollo@gdpd.it](mailto:protocollo@gdpd.it)

Certified email account: [protocollo@pec.gdpd.it](mailto:protocollo@pec.gdpd.it) (*this account can only receive mail from PEC-certified email accounts*)

### Front Office

If you need information on processing and protecting personal data or wish to submit reports or claims to the DPA or ask questions, or if you need support regarding proceedings and relationships with the DPA or just would like to receive documents and information materials.

Open: Mon-Fri, 10 AM to 12,30 PM

- Phone: +39 06.69677.2917 (*Monday to Friday, 10 to 12:30*)

- Email account: [urp@gdpd.it](mailto:urp@gdpd.it)

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