

PRIVACY INFORMATION

For the purposes of current legislation on data protection (including but not limited to the General Data Protection Regulation (Regulation (EU) 2016/679) (General Data Protection Regulation, or "GDPR"), the Data Controller your personal data is: Politubes Srl, with registered office in Corso di Porta Nuova 15, 20122 - Milan - Italy, and with production site in Burago di Molgora, (MB) via E. Fermi, 9/11, 20875 - Italy, VAT number: IT 07346410967, politubes@legalmail.it.

The data will be processed in the premises of Politubes in Burago di Molgora (MB) via E. Fermi, 9/11, Italy.

Our principles

We protect personal data in a serious, lawful, correct and transparent way towards the interested parties. Your data is treated with great care and in full compliance with the applicable law on data processing. Both organizational and technical security measures have been adopted to protect personal data during processing. Our partners who support us will also have to comply with these provisions.

Your personal data are processed

A. without your express agreement (Article 24 letter a), b), c) Privacy Code and art. 6 lett. b), e) GDPR), for the following purposes:

- ✓ conclude current contracts with our company;
- ✓ fulfill the pre-contractual, contractual and tax obligations deriving from existing relationships with you;
- ✓ fulfill the obligations established by law, by a regulation, by legislation; Community or by an order of the Authority (such as in the field of anti-money laundering);
- ✓ exercise the rights of the owner, for example the right to defense in court;

B. Only with your specific and distinct agreement (articles 23 and 130 of the Privacy Code and article 7 of the GDPR), for the following marketing purposes:

- ✓ send you via e-mail, post and / or text message and / or telephone contacts, newsletters, commercial communications and / or advertising material on products or services offered by the Data Controller and survey of the degree of satisfaction with the quality of services;
- ✓ send you commercial and / or promotional communications from third parties (for example, business partners, insurance companies, other companies connected to our company) via e-mail, post and / or sms and / or telephone contacts.

Sharing your personal data

Where appropriate and in compliance with local laws and requirements, we may transmit your personal data, in various ways and for various reasons, to the following categories of subjects:

- ✓ Tax, audit or other authorities, when we believe in good faith that the law or other regulations require us to share this data (for example for requests from the tax authority or in relation to any anticipated dispute);
- o External service providers, acting on our behalf (including external consultants, business partners and professionals such as lawyers, auditors and accountants, IT consultants and technical support staff who carry out checks and development activities on our IT systems);
- ✓ External suppliers of IT services and outsourced archiving of documents, where there is a suitable data processing agreement (or similar protections);
- ✓ Marketing technology platforms and providers;
- ✓ Persons in charge of data processing (all employees, shareholders, administrators and collaborators of the owner who are entrusted with the management of the services requested from our company).

We disclose your data to other recipients only where necessary to fulfill a contract with you, or if there is a legitimate interest, either ours or the recipient, in the disclosure of your data, or if you have given your consent to such transmission.

Transmission to entities outside the European economic area

We also transfer personal data to subjects located outside the European economic area, the so-called third countries. In this case we guarantee, before any data is shared, that an appropriate level of data protection is maintained by the recipient (e.g. on the basis of an adequacy decision taken by the European Commission for the respective country or the agreement on clauses contractual standards between the European Union and the recipient) or that you have given your consent to such sharing.

We are happy to be able to provide you with an overview of all recipients in third countries and a copy of the specific clauses agreed to ensure an appropriate level of data protection. To make such a request, please use the contact details provided at the end of this Data Protection Notice.

How we protect your personal data

The data will be processed with and without the aid of electronic tools, in any case by adopting the security measures required by current legislation.

Politubes S.r.l. - Società a Responsabilità Limitata

Reg. Impr. Monza e Brianza

C.F. e P.IVA IT 07346410967 R.E.A. 1878735

Capitale sociale Euro 100.000,00 int. vers.

www.politubes.com

SEDE OPERATIVA

Via Fermi 9/11 – 20875

Burago Molgora (MB) - Italy

Tel: +39 039 90 54 999

Fax: +39 039 90 54 990

SEDE LEGALE

Corso di Porta Nuova 15

20121 Milano - Italy

Mail: orders@politubes.com

PEC: politubes@legalmail.it

We are committed to taking all reasonable and appropriate measures to protect personal information held by us from misuse, loss or unauthorized access.

To this end, we have put in place a series of appropriate technical and organizational measures. Measures are included to address any suspected data breaches.

If you suspect any misuse or loss or unauthorized access to your personal data, please notify us immediately.

Your rights

If you have any complaints, you can find a list of your rights below. To exercise your rights, please use the contact information provided in this data protection statement.

Right to have information about your data

We will provide you with all information relating to your data in our possession upon request.

Right of rectification and completion of data

We will rectify inaccurate information about you as a result of your notification. We will complete incomplete data reported by you, provided that such data is necessary for the purpose of the processing.

Right to delete data

We will delete information held by us as a result of your request.

However, some data will only be deleted after a specific period of time, for example if we are required to keep the data by law or if we need the data to fulfill our contractual obligations towards you.

Right to block data

In certain cases, provided for by law, we will block your data if you wish. The blocked data will be subject to future processing to a very limited extent.

Right to withdraw consent

You can revoke the consent given to the processing of your data with effect for the future at any time. The legality of the processing of your data remains unaffected until the time of withdrawal of consent.

Right to object to data processing

You can object to the processing of your data with effect for the future at any time, if our data processing is carried out on the basis of one of the legal justifications provided for by art. 6 (1e

or 1f) of EU Regulation 2016/679. In the event of your objection, we will stop processing your data, provided that there are no compelling or legitimate reasons for further processing. The processing of your data for marketing purposes never constitutes a compelling or legitimate reason.

Right to data portability

Upon your request, we may make certain information available to you in a structured, commonly used and machine-readable format.

Right to appeal to the supervisory authority

You can lodge an appeal in relation to the processing of personal data against the data protection authority.

To do this, please contact the competent data protection authority of your place of residence or the data protection authority under whose jurisdiction our company falls (indicated below).

Guarantor for the protection of personal data

e-mail: garante@garanteprivacy.it

Site: <http://www.garanteprivacy.it>

Your contact points for any questions relating to data protection

For any questions relating to personal data or to exercise your rights, please use the following references to contact us directly: privacy@politubes.it

Changes to this information on data processing

This data processing statement reflects the current data processing status.

In the event of changes to data processing, this data processing information must be amended accordingly.

May 2018

Politubes S.r.l. - Società a Responsabilità Limitata

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