

## Information Notice on Personal Data Processing

Pursuant to Art. 13 of Italian Law Decree no. 196/03 (hereinafter referred to as “Data Protection Code”) and pursuant to Articles 13 and 14 of Regulation 2016/679/EU (hereinafter referred to as “GDPR”) Costruzioni Meccaniche Luigi Bandera S.p.A. (hereinafter referred to as “Data Controller”) having its registered office at no. 120 Corso Sempione - 21052 Busto Arsizio (VA), acting as “Data Controller” hereby informs you that your personal data, collected within the framework of data processing procedure known as “**Data Processing necessary to perform a contract**”, shall be processed in compliance with the aforementioned regulations, in order to safeguard Data Subject’s rights and freedoms, as well as physical persons’ dignity, with specific reference to data protection and personal identity. Please consider that if activities to be carried out for you require you to be data controller of third party’s personal data, you shall be responsible for ensuring fulfilment of requirements set forth under regulation in force before Data Subjects in order to make data processing by Data Controller legitimate.

### Origin, purpose, legal basis and nature of data processing

Processing of your personal data, which you have supplied, shall be carried out by Costruzioni Meccaniche Luigi Bandera S.p.A. on the following legal basis, pursuant to Art. 6:

- a) Data processing is necessary to perform a contract Data Subject is a party therein or to carry out preliminary contract measures, which have been adopted upon Data Subject’s request.

Personal data processing shall involve the following processed data:

- a) Tax code and other codes enabling Data Subject’s identification
- b) Name, address and/or other Data Subject’s identification details
- c) Reference details (phone number, e-mail address, etc.)
- d) Professional, economical, trade, financial and insurance activities
- e) Bank details
- f) Tax and accounting data
- g) Value of goods
- h) Nature of goods
- i) Data concerning data Subject’s employees
- j) Professional quality certificates or professional certificates
- k) Product quality certificates or other product certification

### **Communication**

Data Subject's personal data shall be communicated, on the aforementioned legal basis set forth under Art.6, to the following third parties:

- a) Consultants and freelancers
- b) Companies and undertakings
- c) Banks and credit institutions
- d) Business associations
- e) Professional boards and associations
- f) Subsidiaries and associated companies
- g) Chambers of Commerce, Industry, Agriculture and Crafts
- h) Foreign consulates

The aforementioned entities, bodies, associations and professionals shall act as Data Processors appointed by Costruzioni Meccaniche Luigi Bandera S.p.A. or shall be Data Controllers of personal data transmitted to them.

### **Cross-border transfer**

Cross-border transfer of your personal data may be necessary to manage the assigned task. To process any information and data communicated to the aforementioned parties, data protection levels equivalent to the ones adopted for data processing of employees' personal data shall be required. Anyway, only necessary data shall be communicated in order to pursue admitted purposes and regulatory instruments shall be applied pursuant to Articles 43 and 44 of Data Protection Code and Chapter V of GDPR.

### **Processing modalities and logics, and storage periods**

Data Subject's data shall be collected and recorded in a lawful and fair manner for the aforementioned purposes in compliance with principles and provisions set forth under Art. 11 of Data Protection Code and Article 5 paragraph 1 of GDPR.

Personal data shall be processed by manual, automated and computerised means, with logics strictly connected with purposes hereof and, anyway, in such a manner as to ensure compliance with security and protection measures.

Duration of data processing shall be 10 years after contract termination.

### **Nature of data supply**

With regard to the aforementioned purposes, supply of your personal data shall be essential to perform the task agreed between you and Costruzioni Meccaniche Luigi Bandera S.p.A. and to allow Costruzioni Meccaniche Luigi

Bandera S.p.A. to fulfil obligations set forth under applicable regulations: failure to provide the required personal data shall prevent you from establishing and keeping the task agreed between you and Costruzioni Meccaniche Luigi Bandera S.p.A. Therefore, this is to inform you that personal data shall be processed based on provisions set forth under Art. 24 paragraph 1 letter b) of Data Protection Code and Art. 6 paragraph 1 letter b) of GDPR.

### **Data Subject's rights**

In compliance with, within the limits and under terms and conditions set forth under regulations concerning personal data protection and related Data Subject's rights<sup>1</sup> and as far as data processing under this information notice is concerned, as Data Subject you shall have the right to ask whether your data have been processed, to access your personal data and to request for data rectification, data erasure as well as notification of any data rectification and/or erasure to anyone your data were transmitted by Costruzioni Meccaniche Luigi Bandera S.p.A.. Moreover, as Data Subject you shall have the right to restriction of data processing under the hypothesis set forth under the regulation in force, the right to personal data portability – as far as data provided by Data Subject are concerned – in any case detailed in the regulation, the right to object to personal data processing and, specifically, the right to oppose to decisions concerning Data Subject if based on automated data processing, profiling included. In the event Data Subject deems processing of his or her data processing is in breach of provisions set forth under GDPR, Data Subject shall have the right to lodge a complaint with data protection authority pursuant to Art. 77 of GDPR.

Should you need to ask further information about processing of your personal data or exercise of your rights, please contact Eng. Dulio Marco, Bandera **Data Protection Officer (DPO)**, in writing, at: corso Sempione no. 120 – 21052 Busto Arsizio (VA) or via e-mail at: [qualita@lbandera.com](mailto:qualita@lbandera.com).

### **Data Controller**

Data Controller, pursuant to provisions set forth under Art. 4 of Data Protection Code and GDPR, shall be Costruzioni Meccaniche Luigi Bandera S.p.A. having its registered office at no. 120 Corso Sempione - 21052 Busto Arsizio (VA).

Busto Arsizio, 24 May 2018

Best regards,

Data Processor

Piero Bandera

*The information notice hereof has been updated on 25 May 2018*

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<sup>1</sup> Pursuant to Article 7 and subsequent articles of Italian Law Decree no. 196/03, pursuant to Article 12 and Articles 15-22 of European Regulation no. 679/2016.