

CUSTOMER AND SUPPLIER INFORMATION

OMCN S.p.A., with legal and operational headquarters in Villa di Serio (Bg), via Divisione Tridentina n. 23, C.F. and VAT no. 01905830160, e-mail privacy@omcn.it, PEC contabilita@pec.omcn.it (hereinafter, the "Company" or the "Data Controller"), hereby provides, pursuant to art. 13 and 14 of Regulation (EU) 2016/679 ("GDPR"), information relating to the processing of personal data of customers, suppliers, contact persons, employees, collaborators or persons in charge of the same, collected in the context of pre-contractual, contractual and commercial relations with the Company.

This policy describes, in a concise and transparent manner, what data is processed, for what purposes, on what legal basis, how long it is stored, to whom it may be disclosed and what rights can be exercised by the data subjects.

OMCN S.p.A. hereby informs you that the processing of your personal data will be based on the principles of lawfulness, fairness, transparency, limitation of purposes and storage, data minimisation, accuracy, integrity and confidentiality.

Personal data will therefore be processed in accordance with the legislative provisions of the applicable legislation and the confidentiality obligations provided therein.

1. DATA CONTROLLER AND CONTACTS

The Data Controller is OMCN S.p.A., with legal and operational headquarters in Villa di Serio (Bg), via Divisione Tridentina n. 23 C.F. and P.IVA n. 01905830160, which can be contacted at the following addresses: e-mail privacy@omcn.it, PEC contabilita@pec.omcn.it, telephone 035-4234411.

2. CATEGORIES OF PERSONAL DATA PROCESSED

The processing may concern identification and contact data, administrative, accounting and tax data, banking and payment data, data relating to orders, supplies, contracts, shipments, deliveries, commercial communications and data referring to company representatives, employees, collaborators or persons in charge of customers and suppliers.

By way of example and not limited to, the following may be processed: name, surname, company name, address, tax code, VAT number, telephone numbers, e-mail and certified email addresses, company role, bank details, data contained in tax and accounting documents, information relating to contracts, offers, orders and payments.

3. PURPOSE OF THE PROCESSING, LEGAL BASIS AND NATURE OF THE PROVISION

Personal data are processed for the following purposes: management of pre-contractual requests, quotes and offers; execution of contracts, orders, supplies and services; administrative, accounting, fiscal, logistics and payment management; fulfilment of obligations under law, regulations or orders of the authority; protection of the rights of the Data Controller in or out of court; management of ordinary business relationships with customers and suppliers.

The legal bases of the processing are: the execution of pre-contractual or contractual measures; compliance with legal obligations; the legitimate interest of the Data Controller in the ordinary management of commercial relations, system security, fraud prevention and protection of its rights. The provision of data necessary for these purposes is mandatory;

failure to provide it may prevent the establishment, management or continuation of the contractual or commercial relationship.

4. PROCESSING METHODS AND SECURITY MEASURES

The processing is carried out using paper, computer and telematic tools, according to the principles of lawfulness, fairness, transparency, minimization, accuracy, storage limitation, integrity and confidentiality. The Data Controller adopts appropriate technical and organisational measures to protect the data against unauthorised access, loss, destruction, alteration or undue dissemination.

The data are processed by personnel authorised and instructed by the Data Controller and, where necessary, by external parties appointed as data processors pursuant to art. 28 GDPR. The updated list of data processors can be requested from the Data Controller using the contact details indicated in this policy.

5. DATA RETENTION

Personal data are stored for the time necessary to achieve the purposes for which they were collected and, subsequently, for the period required by applicable legislation or necessary for the protection of the Data Controller's rights. In particular, administrative, accounting and tax data are normally kept for 10 years, except for longer terms related to disputes, assessments or legal obligations.

At the end of the retention period, the data will be deleted, anonymised or archived in accordance with criteria consistent with applicable legal obligations and business procedures.

6. RECIPIENTS OF THE DATA AND AUTHORIZED PARTIES

- employees and collaborators of the Data Controller authorized to process data on the basis of their respective duties;
- consultants, professionals, commercial, legal, tax and labor firms;
- providers of IT, management, administrative, logistics, banking, insurance and archiving services;
- public authorities, supervisory bodies, judicial or administrative authorities, in the cases provided for by law.

Personal data will not be disseminated. Communication to third parties will take place exclusively within the limits necessary for the pursuit of the purposes indicated in this information and in compliance with applicable legislation.

If third parties process personal data on behalf of the Data Controller, they will be designated as data processors by means of a specific written agreement, in accordance with art. 28 GDPR.

7. TRANSFER OF DATA TO THIRD COUNTRIES

Personal data is mainly processed within the European Union. Should it be necessary to transfer personal data to third countries or international organizations, the Data Controller will ensure that the transfer takes place in compliance with art. 44 et seq. of the GDPR, on the basis of an adequacy decision of the European Commission or appropriate safeguards, such as standard contractual clauses, where applicable.

8. RIGHTS OF THE DATA SUBJECT

In the cases and within the limits provided for by the GDPR, the data subject may exercise the following rights: access to personal data; rectification of inaccurate data or integration of incomplete data; deletion of data; restriction of



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REGISTERED OFFICE:

Via Divisione Tridentina, 23 - 24020 Villa di Serio (BG)

Tel. 035 - 42.34.411 r. a. - Fax 035 - 42.34.441

Pec: contabilita@pec.omcn.it

Share Capital € 3.150.000,00 i.v.

Reg. Impr. BG - C.F. - P. Iva: 01905830160 R.E.A. BG 246682

Registration of the National Register of EEE Producers n°

Massimiliano Medda - Via Divisione Tridentina, 23 - 24020 Villa di Serio (BG)

processing; objection to processing; data portability; withdrawal of consent, where the processing is based on consent, without prejudice to the lawfulness of the processing carried out before the withdrawal.

The data subject also has the right to lodge a complaint with the Data Protection Authority, if he/she believes that the processing of personal data is carried out in violation of the applicable legislation.

Requests for the exercise of rights can be addressed to the Data Controller by writing to the e-mail address privacy@omcn.it, to the PEC contabilita@pec.omcn.it, or by communication sent to the Company's registered office.

The Data Controller will respond to the request within one month of receipt. This deadline may be extended by two months, if necessary, taking into account the complexity and number of requests; in this case, the Data Controller will inform the data subject of the extension and the related reasons within one month of receipt of the request.

BRANCHES:

PEDRENGO

Via U. Foscolo, 4 – 24066 Pedrengo (BG)

SAN BONIFACIO

Via Ritonda, 78 – 37047 San Bonifacio (VR)