

Information pursuant to Article 13 of the EU Regulation No. 2016/679 (hereinafter also referred to as GDPR) on the Protection of Personal Data relating to Individuals for Processing of Customers' Personal Data

1. In application of the EU Regulation No. 2016/679 on the Protection of Personal Data relating to Individuals, pursuant to Art. 13, the company ALPE-ADRIA TEXTIL SRL provides below the information relating to the collection and processing of Personal Data acquired under the contract entered into with Customers, highlighting that such processing is carried out in accordance with the principles of fairness, lawfulness, and transparency established by the GDPR.

(a) IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER.

The Data Controller is ALPE-ADRIA TEXTIL SRL, with a registered office in Remanzacco (UD), Strada di Salt, 50, VAT/TAX code 01681200307, where the data is processed. The data subject may exercise the rights under Articles 15 to 22 of the EU Regulation by contacting us through the certified e-mail address alpeadriatextil@legalmail.it or by sending a registered mail with return receipt to the above address.

(b) CONTACT DETAILS OF THE DATA PROTECTION OFFICER.

The Data Controller is not among those for whom the appointment of the Data Protection Officer is mandatory pursuant to Art. 37, 38, and 39 of GDPR.

(c) PURPOSE OF TREATMENT AND LEGAL BASIS.

The processing of personal data aims at the correct and complete execution of the existing contract; in particular, the data are processed to provide for requirements related to the economic activity of the company ALPE ADRIA-TEXTIL SRL, which operates in the **production and promotion of innovative textile solutions designed to meet the application needs in the geotechnical field.**

Data are also processed for the execution of administrative, fiscal, and accounting obligations and fulfilments required by law; for commercial communications inherent to the contract; to give effect to any further contractual fulfilments with Clients; for the management of support services regarding the goods and services provided by the Company; to allow the activity with external collaborators; for any further operational-managerial activity related to the existing relationship. Within the scope of executing the said contract, common personal identification data (first name, last name, subject, contact details) concerning your Person—in your capacity as the Managing Director and/or legal representative of the company—and common identification data concerning shareholders and individuals working within the company or on behalf of the company are inevitably processed. Since the processing of the data is necessary for the conclusion and execution of a contract to which the Data Subject is a party or for the execution of pre-contractual measures taken at the request of the Data Subject, the legal basis for the processing is that provided for in Article 6 par.1 item (b) of GDPR and therefore the fulfilment of a contract and item (c) for the fulfilment of a legal obligation to which the Data Controller is subject.

The data is processed for communication and/or sending of e-mails, text messages, mail, telephone contact, etc., also by automated means, for the correct execution of the existing contract and to promote products and/or services similar to those previously purchased (so-called soft spam).

(d) INDICATION OF THE LEGITIMATE INTERESTS DETERMINED BY THE DATA CONTROLLER OR BY THIRD PARTIES IF THE PROCESSING IS BASED ON ART. 6 GDPR PAR. 1 ITEM (F)



The Controller's processing may be based on the legitimate interest referred to in Art. 6 par.1 item (f) in the following cases: -payment reminder to the Customer; -direct marketing purposes when the person concerned is already a customer of the company and there is an interest in such communications; -for the promotion of products and/or services similar to those previously purchased by the addressee (so-called soft spam); -for protection against fraud; -for reporting offences to the judicial authorities.

e) ADDRESSEES OR CATEGORIES OF ADDRESSEES OF PERSONAL DATA

The data may be communicated to parties pursuant to Art. 29 GDPR who carry out the processing under the authority of the Data Controller or the DPO who has legitimate access to the personal data as a result of the written mandate to process the data; to parties whose access is envisaged and regulated by provisions of law or regulations; to credit institutions for the management of collections and payments, external parties pursuant to Art. 28 as DPOs carrying out activities on behalf of the Controller; to subjects carrying out functions connected with the execution of the contract such as lawyers, consultants, carriers, forwarding agents, IT suppliers, insurers, banks for collections, etc.

(f) TRANSFER OF DATA ABROAD

Within the scope of the said processing, no transfer abroad is envisaged. In any case, it is specified that personal data are stored on servers located in Italy and, in any case, within the European Union. In any event, it is understood that the Data Controller may also move the servers outside the EU if necessary. In this case, the Data Controller assures as of now that the transfer of data outside the EU will take place in compliance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided for by the European Commission.

2. In addition to the information referred to in para. 1 the Controller shall provide the Data Subject with the following additional information necessary to ensure fair and transparent processing:

a) DATA STORAGE PERIOD

The Data shall be kept for no longer than is necessary for the purposes for which it was collected and processed and for further tax obligations imposed by current legislation. In the event of legal disputes, the Data shall be kept for the entire duration of the same until the time limit for appeals is exhausted. Once the aforementioned storage terms have expired, the Data will be destroyed or made anonymous, compatibly with the technical procedures of deletion and backup.

(b) RIGHT OF ACCESS TO PERSONAL DATA, RECTIFICATION, CANCELLATION, PORTABILITY OF DATA, LIMITATION OR OPPOSITION OF THE DATA PROCESSING BY THE DATA SUBJECT

The Data Subject may exercise the rights set out in Articles 15 to 22 of the GDPR; in particular, the right of access (Art. 15) allows the Data Subject to obtain confirmation as to whether or not data is being processed and, if so, to access that data; the right to rectification and integration (Art. 16) allows the Data Subject to request the correction of data concerning them; the right to cancel/forget (Art. 17) allows the Data Subject to request and obtain the cancellation of personal data concerning them in at least one of the following cases: 1) the processing is no longer necessary for the original purposes; 2) revocation of consent; 3) objection to processing; 4) unlawfulness of processing; the right of restriction (Art. 18) is granted to the Data Subject if the accuracy of the data is contested for the period necessary to verify its accuracy; or if processing is unlawful and the Data Subject decides not to object but to exercise the right of restriction; the right to data portability (Art. 20) allows the Data Subject to receive, in a structured, commonly used and machine-readable format, the personal

data concerning them, and to have them transmitted to another Data Controller indicated by the Data Subject; the right to object (Art. 21) provides for the Data Subject's right to object at any time to the processing of data concerning him or her when the legal basis that made the processing lawful no longer exists; the right not to be subjected to automated decision-making processes (profiling) (Art. 22) that may lead to legal effects capable of significantly affecting the individual, except where such a decision is necessary for the conclusion or performance of a contract, or is authorised by the EU or is based on the explicit consent of the data subject.

The Data Subject may exercise their rights under Articles 15 to 22 of the EU Regulation by contacting: **certified email alpeadriatextil@legalmail.it, landline +39 0432 676838**

c) RIGHT TO WITHDRAW CONSENT TO DATA PROCESSING

The legal basis of the Data Subject's processing is that provided for in Article 6 par.1 item (b) GDPR and, therefore, the fulfilment of a contract and item (c) for the fulfilment of a legal obligation to which the Data Controller is subject. Therefore, the Data Subject is not required to consent to the processing of their data, with reference to the purposes set out in letter (c) paragraph 1. of the above-mentioned Notice.

d) RIGHT TO CLAIM

The Data Subject has the right to lodge a complaint with the Supervisory Authority against the processing of data relating to them if it does not comply with the EU Regulation.

e) NATURE OF SUBMISSION AND CONSEQUENCES OF REFUSAL OF SUBMISSION

The submission of data by the Data Subject is a necessary requirement for the conclusion and execution of the contract; the Data Subject is obliged to provide the data in order to execute the contract; refusal to provide the data determines the impossibility for ALPE ADRIA TEXTIL SRL to execute its contractual obligations.

(f) PROCESSING THROUGH AN AUTOMATED DECISION-MAKING PROCESS (INCLUDING PROFILING)

In carrying out the processing purposes set out herein, the Controller does not carry out any automated decision-making processes pursuant to Art. 22(1) and (4).

ALPE-ADRIA TEXTIL SRL

Information updated on 6th May 2024

