

PRIVACY POLICY pursuant to the GDPR 679/2016

FPA di Poli Tiziano e Poli Pierantonio S.n.c. pursuant to Articles 4 and 28 of Legislative Decree 30 June 2003, n. 196 - Privacy Code (the following, "Code") and of articles 4, n. 7) and 24 of EU Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data (the following, "Regulation") pursuant to art. 13 of the Code and of the Regulations informs you that for the establishment and execution of relations with you in progress, you have personal data (personal and fiscal), also acquired verbally directly or through third parties, related to you.

In order to comply with the obligations set out in the Code and the Community regulations regarding privacy in relation to your data, we invite you to take note of the following information and to consent to the processing of personal data that our company will acquire.

The General Data Protection Regulation (or, in short, GDPR) is a positive step towards people to have more control over how personal data are used. On 25 May 2018 this new legislation comes into force and we have modified a series of processes and policies to prepare our business. We are committed to protecting and respecting the personal information that is shared with us.

This statement describes what types of information we collect, how they are used, how we share with other organizations, how rights can be exercised regarding the information we hold and how we can contact our reality.

With regard to direct marketing communications, it will always be possible to inform us to stop these activities. We will never send "unwanted" emails or communications and will not share data with anyone else. We do not resell your information to third parties, but we work closely with selected partners who help us to provide information, products and services that are required.

The content of this policy may change from time to time, so you may need to check this page occasionally to ensure that information is shared. Where possible, we will look for a direct contact to inform about any new changes.

1. WHAT INFORMATIONS ARE COLLECTED?

We collect personal information through the site, applications or direct contact. We only collect information that is necessary, relevant and appropriate for the purpose for which it is provided.

The information we collect may include some or all of the following:

- **Identity data:** includes name, surname, user name or similar identifier and title.
- **Contact information:** include billing address, delivery address, e-mail address and telephone numbers.

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- **Financial data:** includes details of the bank account and payment card collected solely for the purpose of completing the purchase.
- **Transaction data:** include details about payments to and from the customer / supplier and other details about the products and services that are purchased or sold.
- **Profile data:** includes purchases or orders placed, any social profiles (if applicable), preferences, feedback, communications and responses to internal surveys and your password and username if applicable (customer portal).
- **Usage data:** include information on how the website is used, products and services.
- **Marketing and communication data:** include preferences in receiving marketing communications and from third parties and communication preferences.
- **Technical data:** include the Internet Protocol (IP) address, the access data, the type and version of the browser, the time zone setting and the browser plug-in location, types and versions, the system operational and platform and other technologies on devices used to access corporate websites.

2. HOW DO WE USE THE INFORMATION THAT IS COLLECTED?

Only the information necessary for the purpose for which it was collected is processed. You are given the option of not receiving marketing communications from us (and consent may be withdrawn at any time). No "unwanted" emails or communications are sent and data is not shared with anyone else, except to carry out the purchase or sale contract. Personal data are used exclusively for the purposes and legal bases indicated in the following table:

Purpose(s) for processing	Legal bases for processing data
<p>We may use and process personal information where this is necessary to execute a contract and to fulfill and complete orders, purchases and other transactions entered into with the writer and for contractual performance analysis.</p> <ul style="list-style-type: none">• To register a new customer, create and manage their customer account and provide services to the user.• Provide technical support of the product.• Provide training courses for the user and certifications to customers.• Manage the relationship, including order processing and delivery of the requested product or service or vice versa with suppliers.	<p>Processing is necessary for the execution of a contract or to stipulate a contract.</p>

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<ul style="list-style-type: none"> • Provide information about our company and its products and services and provide newsletters or email updates to the user; • To inform about special offers and products or services that might be of interest. • Understand the flow of traffic on our website and provide a better website experience and understand the needs of our customers. 	<p style="text-align: center;">Consent can be withdrawn at any time</p>
<ul style="list-style-type: none"> • Measure the interest of customers and suppliers and improve our products, services and website. • Provide information, products or services requested. • To fulfill the obligations arising from any contracts stipulated. • Help to provide the highest level of customer care; • Manage and operate our website - to keep our website up to date and relevant, to develop our business and to inform our marketing strategy and monitor how we use our website. • Provide general information on the website and provide our products and services. • Ensure that the content of the website is presented in the most effective way. • To display more relevant and relevant advertisements on the website. 	<p>Processing is necessary to support legitimate business interests in the management of our business. Please note that you have the right to object to the processing of personal data carried out for our legitimate interest. That is, the right to object at any time remains assured.</p>
<p>For the prevention and detection of fraud, money laundering or other crimes or for the purpose of responding to a binding request from a public authority or a court.</p>	<p>The data treatment policy is necessary to comply with legal and regulatory obligation</p>
<p>We may have to process personal information to contact you if you have an urgent security notice.</p>	<p>In rare cases of vital interest</p>

3. HOW DO WE SHARE THIS INFORMATION?

We do not sell information to third parties. However, we may from time to time disclose the information to the following categories of companies or organizations that we are responsible for managing services on our behalf: support service providers, customer contact centers, agencies and direct marketing consultants, market research and market analysis service providers, our legal advisors and other professionals.

We work to ensure that all third-party partners who manage the information comply with data protection legislation and protect information just like we do. We only disclose personal information **STRICTLY**

necessary to provide the service we are undertaking on our behalf. We will aim to anonymize information or use specific aggregated data sets where ever possible.

4. HOW LONG IS THE INFORMATION KEPT ?

We will not store personal information in an identifying format for a longer period than necessary. For customers or suppliers, we will retain personal information for a longer period of time than processing potential customers / suppliers.

However, we do not store personal information in an identifying format longer than necessary.

In the case of a continuous relationship (for example, a customer), we retain personal information for 10 years from the date on which our report ends. We retain personal information for this period to establish, bring or defend any legal claims. Our relationship could end for a variety of reasons.

Where we have obtained personal information following a request for information, brochures, quotations or any other information about any of our products or services, we store your personal information for 1 year and 6 months from the date we collect this information, unless that during this period an effective relationship is created, for example, a purchase. We will continue to process this data in line with the initial request for 6 months, so that we can establish a relationship with the potential customer / supplier. After this period the data will remain pending for 1 year before being removed, unless a report is formed within this time.

The only exceptions to the periods mentioned above are where:

- the law requires to keep personal information for a longer period, or to delete it first;
- in the event that you have raised a complaint or concern about a product or service offered, in which case we will retain your information for a period of 10 years from the date of that claim or request; or
- you exercise the right to delete information (where applicable) and you do not need to keep it in relation to one of the reasons allowed or required by law

5. HOW IS THE INFORMATION MANAGED ?

Each individual has the right as an individual to access personal information and make corrections if necessary. You also have the right to revoke the consent you have previously provided to us and to request that we delete the information we retain. You may also object to the use of personal information (where we rely on our business interests to process and use such personal information).

There are a number of rights in relation to personal information under the Data Protection Act. In relation to most of the rights, we will request information to confirm the identity and, where applicable, to help us search for personal information. Except in rare cases, we will respond within 30 days of receipt of your

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request.

Users have the following rights:

- Request a copy of the information we have in our possession;
- Correct and update your information;
- Withdraw consent. Please see "How we use this information";
- Subject to our use of user information (where we rely on our legitimate interests to use your personal information), provided that there are no legitimate reasons for continuing to use and process information. When we rely on our legitimate interests to use your personal information for direct marketing, we will always respect the right to object;
- Delete your information (or limit its use), provided that there are no legitimate reasons for continuing to use and process such information;
- Transferring the information to a structured data file (in a format commonly used and readable by the machine), in which we entrust the consent to use and process personal information or to process it in relation to the contract.

In the case of a subject access request or a request for information, please be aware that if the request is unfounded or excessive, we may still charge a fee or refuse to act on the request.

Please also note that when we remove data from our system, or after the time periods indicated earlier in this document or upon request, the data is permanently removed from our system and may affect any subsequent access requests.

It is possible to exercise the above rights and / or manage the information by contacting us, using the details below:

Address: via Matteotti, 163 ,Gardone Val Trompia-(BS)

Email: info@fpafratellipoli.com

If you have specific questions about data protection or a complaint, you can contact our data protection team at the address info@fpafratellipoli.com .

6. WHERE WE STORE PERSONAL DATA ?

The personal data we collect can be transferred to, and stored in, a destination outside the European Economic Area (EEA), for the purposes described above, even in countries such as the United States of America or Russia, which can not provide an adequate level of protection in relation to the processing of data. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy and Cookie Policy and data protection legislation. To the extent that personal data must be transferred outside the EEA, we will ensure that appropriate safeguards have been taken to protect the privacy and integrity of such personal data, including the model clauses of the European Union pursuant to Article 46.2 (for example using the so-called Binding Corporate Rules). Please contact us if you wish to obtain information on these safeguards

7. COOKIES

Cookies are text files that identify the computer (through the so-called IP address) on our server. For information on the reasons for using them, please refer to the "How we use the information collected" section of this Privacy Policy. While in some cases it may be possible, we do not use the IP address as a means of identifying the user. Generally, it is possible to set the computer to accept all cookies, to be informed when a cookie is issued or to not receive cookies at any time. It can be done through the internet browser. With most browsers, this function can be accessed via the 'tools' menu (eg Internet Explorer), 'edit', or 'task' (eg Netscape). If there are problems finding this area, the "help" function within the browser will be able to provide assistance. You can also find more detailed information on cookies and how to manage them on <http://www.allaboutcookies.org>

If you refuse a cookie, this may prevent the site from functioning properly or even prevent access to certain areas.

7.1 HOW DO WE USE COOKIES?

Depending on the function and purpose of use, cookies can be classified into technical cookies, analytical cookies, profiling cookies. All cookies are divided into first-party cookies, installed directly by the site operator and in third-party cookies, installed through the Site by third parties.

Based on the characteristics and use of cookies, we can distinguish different categories:

Navigation Cookies on the Website tracks the cookie path (so-called "click stream" activity, ie the recording of the paths followed by the visitors of a site in the passage from one page to another) without being able to know or identify the user who entered the site, in order to collect statistical data on the site such as, for example, the pages visited, the pages downloaded, etc.

We reiterate that none of this information is associated with you individually. Cookies do not capture your personal e-mail address, nor any of your private information. The information obtained by tracking cookies is only evaluated overall. The web server log files are also used to count visitors and evaluate the technical capabilities of our site. We use all this information to find out how many people visit the Site, to organize the

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pages in the most accessible way possible, to facilitate navigation on the site and to make its pages more useful to users. We collect information on site traffic, but not on individual visitors. Consequently, no information concerning you in particular can be stored or used.

Session Cookies are strictly necessary to provide you with the services available through our website and to use some of its features.

Since these cookies are strictly necessary to provide the website, it is not possible to refuse them without affecting the operation of our website, but it is possible to block or delete them by modifying the browser settings and imposing the blocking of all cookies on this website.

The Google Analytics Cookies collect information that is used in aggregate form to help us understand how our website is used or the effectiveness of our marketing campaigns or to help us customize the site in order to improve your experience.

Finally, **Profiling Cookies** create user profiles and are used to send advertising messages in line with the preferences shown by the user while browsing the web.

- The owner has decided not to use them due to the particular invasiveness that such devices can have in the private sphere of users.
- The cookies collected for the purposes listed above may be communicated to the competent subjects in charge of managing the site for the performance, even partial, of activities related to the assignment.
- This Site exclusively uses technical, navigation or session cookies and analytics, to allow browsing and provide the service requested by the User.
- For all cookies other than technical cookies, the User's express consent is required the first time he or she visits the Site. Consent is tracked on subsequent visits, however the User always has the option to revoke in whole or in part the consent already expressed.

7.2. DURATION

Some cookies (session cookies) remain active only until the browser is closed. Other cookies (persistent cookies) "survive" when the browser is closed and are also available in subsequent visits by the user, and their duration is set by the server at the time of their creation with a set expiration date.

The setting can be defined specifically for different websites and web applications. In addition, the most common browsers allow you to define different settings for various types of cookies.

You can set your browser to be notified in case of attempts to insert cookies, limit them or refuse them completely.

8. CHANGES TO THIS PRIVACY POLICY

This Notice is effective from 25 May 2018.

FPA di Poli Tiziano e Poli Pierantonio S.n.c. reserves the right to modify the content, in part or completely, also due to changes in the Privacy Statement. FPA di Poli Tiziano e Poli Pierantonio S.n.c. will publish on the Website the updated version of this Privacy Policy: therefore we invite you to regularly visit this section.

Data Controller: Pierantonio Poli located in via Matteotti, 163 Gardone Val Trompia, 25063-(BS)

Given the objective linked to the identification of cookie-based technologies and their very close integration with the functioning of the web, see the following link <http://www.allaboutcookies.org>.