

**NOTICE ON THE PROCESSING OF PERSONAL DATA OF CUSTOMERS AND
POTENTIAL CUSTOMERS (“NOTICE”)**

AlphaMAC S.r.l. assigns great importance to the protection and security of the personal data it processes in accordance with Regulation (EU) No 679/2016 on the protection of personal data (the “**Regulation**”) and Italian Legislative Decree no. 196/2003 (the “**Privacy Code**”). Pursuant to Article 13 of the Regulation, we are undertaking, with this Notice, to provide the following information concerning the processing of the personal data of customers and potential customers (in cases where the latter are natural persons or single-person businesses), as well as the personal data of the legal representatives and employees of customers and potential customers (in cases where the latter are legal persons) (hereinafter, the “**Data**”).

1. Data Controller, joint controllers and appointment of a data protection officer

1.1 The Data Controller is Alphamac S.r.l., with registered office in Bologna, Piazza Malpighi, 7, Tax Code and VAT no. 03772271205, e-mail info@alphamac.it (the “**Controller**” or “**Company**”). In relation solely to the Data processing operations conducted for purposes 2 and 3 of Article 3.1 (“**Joint Controllers**”), it should be noted that the Company and Logimatic S.r.l., with registered office in Ozzano dell’Emilia (BO), Via della Grafica, 35, Tax Code and VAT no. 02426071201, (hereinafter, “**Logimatic**”) - which provides, through outsourcing, staff administration and accounting services and the administration and execution of associated legal obligations - shall act as joint controllers (hereinafter, the “**Joint Controllers**”) in consideration of the fact that they decide jointly on the purposes and means of the processing. The Joint Controllers have signed a joint control arrangement pursuant to Article 26 of the Regulation, the essential content of which may be requested by writing to the e-mail address of the Company or that of Logimatic.

1.2 The Controller has appointed the company IQC S.r.l. as the data protection officer (“**DPO**”), which may be contacted for clarifications regarding the processing of personal data. The contact details of the DPO are as follows:

e-mail: Barbara.decillis@studiolegaledds.it.

2. Type of data processed and source of personal data

2.1 The Data processed by the Controller are as follows:

a. common data: by way of example, personal details (forename, surname, place and date of birth), tax code, VAT no., unique code, IBAN code, e-mail and certified e-mail addresses, e-mails sent and received, telephone number, role and/or classification in the company, type and quantity of goods purchased, purchase orders, turnover and signature, username and password for access to the private area of the Controller’s website.

2.2 The Data processed by the Controller are provided by customers and potential customers, as well as by their legal representatives or staff through one or more of the following channels:

- within the context of a direct interaction with our Company through a visit, telephone call, SMS or e-mail;
- online (through registration on the www.alphamac.it website);
- by completing a contact form at a trade fair;
- through business cards or contacts on the mobile phone provided to our staff.

3. Purposes of the processing and associated legal basis

3.1 The Controller shall process the Data for the following purposes:

	Purpose	Legal basis of the processing of common data	Data retention period
1	To respond to requests from a customer or potential customer (e.g. requests for a quote, technical information, etc.).	to take steps prior to entering into a contract (Article 6(1)(b) of the Regulation).	The personal data processed for this purpose are stored for the time necessary for satisfying the request.
2	To conclude a contract concerning goods or services requested by the customer.	Performance of a contract (Article 6(1)(b) of the Regulation).	The personal data processed for this purpose are stored for the term of the contract.
3	To comply with legal and/or regulatory obligations (e.g. civil tax and accounting obligations).	processing is necessary for compliance with a legal obligation to which the Controller is subject (Article 6(1)(c) of the Regulation).	The personal data processed for this purpose are stored until the expiry of the legal obligations (e.g. obligation to retain data for 10 years from the final registration date, pursuant to Article 2220 of the Italian Civil Code).
4	Indirect processing and any processing of personal data arising from the use of e-mail and certified e-mail conducted by the Controller: (i) for organisational and production needs and to protect company assets; (ii) for systems security requirements, the associated maintenance and the resolution of technical problems; (iii) to ensure the ordinary carrying out and continuity of business activities; (iv) to improve relations with stakeholders, using the CRM tool; (v) to comply with legal obligations, such as, by way of example, the obligation to ensure proper storage of documentation based on specific legal provisions (e.g. Article 2220 of the Italian Civil Code) and the obligation to provide	<p>- Legitimate interest of the Controller (Article 6(1)(f) of the Regulation) consisting in the right to adopt measures to pursue organisational and production needs and to protect company assets, for systems security requirements, the associated maintenance and the resolution of technical problems, to ensure the ordinary carrying out and continuity of business activities, to improve relations with stakeholders, using the CRM tool, and to establish, exercise and defend a legal claim;</p> <p>- Compliance with legal obligations (such as, by way of example, the obligation to ensure proper storage of documentation based on specific legal provisions, pursuant to Article 2220 of the Italian Civil Code, and the obligation to provide personal data to comply with a specific request from the judicial or police authorities (Article 6(1)(c) of the Regulation).</p>	<p>E-mail: electronic communications sent and received using the company e-mail addresses are kept on company PCs, the servers of e-mail and cloud storage suppliers and the company server for 24 months and then deleted, except in the following cases: (i) company e-mail messages whose content is legal or commercial are stored for 10 years in accordance with Article 2220 of the Italian Civil Code; (ii) in the event of a dispute, e-mails will be kept for its duration and deleted at the end thereof;</p> <p>Certified e-mail: for 10 years in accordance with Article 2220 of the Italian Civil Code and, in the event of a dispute, the certified e-mails will be kept for its duration and deleted at the end thereof.</p>

	personal data to comply with a specific request from the judicial or police authorities; (vi) to establish, exercise and defend a legal claim.		
5	To send newsletters to customers and potential customers (through e-mail and by post).	Consent (Article 6(1)(a) of the Regulation).	The personal data processed for this purpose are stored for 24 months from the obtaining of consent, in the absence of withdrawal thereof.
6	For direct marketing activities (through e-mail, by post or using WhatsApp and/or SMS) aimed at promoting the Company's products and services to customers and potential customers, sending invitations to trade fairs of interest to a customer or potential customer or inviting them to events organised by the Company.	Consent from the data subject (Article 6(1)(a) of the Regulation) to be given from time to time.	The personal data processed for this purpose are stored for 24 months from the obtaining of consent, in the absence of withdrawal thereof.
7	To send commercial communications by e-mail concerning products and services similar to those already purchased by the customer (soft spam).	Article 130(4) of Italian Legislative Decree 196/2003 or the legitimate interests pursued by the Controller consisting in promoting the sale of similar products (Article 6(1)(f) of the Regulation).	The personal data processed for this purpose are stored for 24 months from the final purchase, with no prejudice to the right to object.
8	In order to carry out customer satisfaction activities and market research with customers and potential customers.	Consent from the data subject (Article 6(1)(a) of the Regulation) to be requested from time to time.	The personal data processed for this purpose are stored for 24 months from the obtaining of consent, in the absence of withdrawal thereof.
9	To establish, exercise or defend a controller's right in a judicial or out-of-court procedure.	the legitimate interests pursued by the Controller consisting in protecting the constitutionally guaranteed right of defence (Article 6(1)(f) of the Regulation).	In the event of a dispute, the data will be deleted at the end thereof.
10	To enable customers to register and access the private area of the www.alphamac.it website, where they may obtain information about products and send purchase orders for spare parts and, in the event of	- Consent (Article 6(1)(a) of the Regulation).	The personal data processed for this purpose will be stored until consent is withdrawn, with no prejudice to the fact that withdrawing consent for processing will not affect the processing of the customer's data to comply with legal obligations or to perform an existing contract with said customer.

	loss of log-in details, activate the procedure enabling recovery and resetting of the password.		
--	---	--	--

4. Data processing procedures

4.1 The Controller shall process the Data in accordance with principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality and accountability.

4.2 The Controller shall implement technical and organisational measures suitable for guaranteeing a level of Data security appropriate for the risk faced.

4.3 The Controller may choose to process Data using paper, computerised and electronic tools.

5. Categories of Data recipients

5.1 The Data, depending on the purpose, may be communicated to the following categories of recipients, which are required to adhere to the Regulation and Privacy Code, have undertaken to uphold the confidentiality of the Data processed or are subject to legal confidentiality requirement and are using the Data solely to perform their respective functions: boards of statutory auditors, independent auditors, planning and technical assistance service contractors, suppliers of machinery, providers of IT services, cloud storage, hosting, logistics services, marketing agencies, consultants and freelancers, legal authorities and arbitrators, mediation bodies, public authorities and public bodies (e.g. customs and chamber of commerce).

5.2 All the categories of recipients indicated above, depending on the case, shall operate as independent controllers, joint controllers pursuant to Article 26 of the Regulation, or will be appointed processors in accordance with Article 28 of the Regulation.

6. Transfer of data to third countries

6.1 The Controller shall not transfer the Data to a third country except for e-mails sent and received which are archived on the servers of e-mail and cloud storage providers used by the Controller. Such servers may be located outside the European Union. In such cases, the Data will be transferred in accordance with the stipulations in chapter V of the Regulation. Moreover, it shall be guaranteed that Data will be transferred to non-EU Member States where the European Commission has decided, in accordance with Article 45 of the Regulation, that the laws in force there guarantee an adequate level of personal data protection. In the absence of such a decision by the European Commission, the Data may only be transferred to non-EU Member States after they have adopted appropriate safeguards, in compliance with Article 46 of the Regulation (for example by adopting the standard contractual clauses established by the European Commission) or by acting in compliance with the provisions of Articles 47, 48 and 49 of the Regulation.

7. Data retention period

7.1. For information about the Data retention period or, alternatively, the criteria used for determining that period, see the table shown in Article 3.1 above.

8. Nature of the provision of data and consequences of refusal to provide data

8.1 The conferral of Data for the purposes indicated in points 1, 2, 3 and 4 of Article 3.1 above is mandatory. Should data be unavailable and/or the data subject refuse to grant consent for the processing thereof, the Controller will be unable to execute the requests of the customer or potential customer, conclude a contract with the customer or correctly fulfil all the legal and contractual requirements. The conferral of Data for all the other purposes indicated in Article 3.1 above is optional. Consequently, the customer or potential customer may decide not to grant express consent or to withdraw it at any time or to object to the processing where the reason for such objection is based on his/her legitimate interests. In the event of the customer's or potential customer's failure to provide specific consent for processing, the Controller will be unable to carry out the activities referred to herein.

9. Rights of the data subject

9.1 The data subject may contact the Controller by sending an e-mail to info@alphamac.it, to exercise the rights provided for in the Regulation, a brief description of which is provided here:

- right of access (Article 15 of the Regulation): You have the right to request: a) the purposes of the processing; b) the categories of personal data concerned; c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; f) the right to lodge a complaint with a supervisory authority; g) where the personal data are not collected from the data subject, any available information as to their source; h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- right to rectification (Article 16 of the Regulation): You have the right to obtain the rectification of inaccurate personal data concerning you and to have incomplete personal data completed;
- right to erasure (Article 17 of the Regulation): You have the right to obtain the erasure of personal data where the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, you withdraw the consent on which the processing is based, you object to the processing pursuant to Article 21(1) of the Regulation and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21(2) of the Regulation, the personal data have been unlawfully processed, they have to be erased for compliance with a legal obligation;
- right to restriction of processing (Article 18 of the Regulation): You have the right to obtain restriction of processing where you have contested the accuracy of the personal data (for a period enabling the controller to verify the accuracy of the personal data), or the processing is unlawful, but you oppose the erasure of the personal data and request the restriction of their use instead, or they are required for the establishment, exercise or defence of legal claims, while the controller no longer needs them and you have objected to the processing pursuant to Article 21(1) of the Regulation (pending verification of whether the legitimate grounds of the controller override those of the data subject);
- right to data portability (Article 20 of the Regulation): You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where the processing is based on consent or on a contract and the processing is carried out by automated means;
- right to object (Article 21 of the Regulation): You have the right to object to the processing of data based on Article 6(1)(e) or (f), with no prejudice to the Controller's right to demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Moreover, you have the right to object to the processing of data for direct marketing purposes;
- right to withdraw consent (Article 7 of the Regulation): You have the right to withdraw consent given for the processing operations for which it is requested.
- right not to be subject to automated decision-making (Article 22 of the Regulation): You have the right not to be subject to a decision based solely on automated processing.

9.2 The exercising of the rights indicated above is subject to the limits, rules and procedures stipulated in the Regulation. Moreover, in accordance with the provisions of Article 12(3) of the Regulation, the Controller shall provide the data subject with information on the action taken without undue delay and, in any event, within 30 days at the latest of receipt of the request. This deadline may be extended by 60 days, if necessary, in consideration of the complexity and number of requests. The Controller shall notify the data subject of such an extension and the reasons for the delay within 30 days of receipt of the request.

9.3 We also wish to inform you that you have the right to lodge a complaint with the Data Protection Authority, which may be contacted using the details provided on the www.garanteprivacy.it website.