



DISCLOSURE PURSUANT TO ART. 13 EU REGULATION No. 2016/679 (GDPR) Customers and prospects

The company **SORMA S.p.A.**, with registered office in Mestre (VE), 30174, Via Don Tosatto, no. 8, as the data controller (hereinafter, the "**Data Controller**"), in the person of its **legal representative Sorgato Arturo**, hereby, informs you pursuant to Art. 13 of EU Regulation no. 2016/679 (hereinafter, the "**GDPR**") that your data will be processed in the following manner and for the following purposes:

1. Scope of processing

The Data Controller processes personal data (such as name, surname, company name, address, telephone, e-mail, bank and payment details), hereinafter referred to as "**personal data**" or "**data**", provided by you during the definition of contracts for the products/services of the Controller.

2. Purposes of processing

Your personal data are processed:

A) in compliance with Art. 6(b), (c) and (f) of the GDPR, for the following Purposes:

- execution of the purpose of the contractual relationship to which you are a party, or execution of pre-contractual measures taken upon your request;
- fulfilment of a legitimate purpose of the Data Controller, on condition that such purpose will be not overcome by basic interests, rights and freedoms of the data subject;
- fulfilment of pre-contractual, contractual and tax obligations deriving from relationships in place with you;
- fulfilment of obligations laid down by law, by regulations, by EU legislation or by an order of the Authority (such as that of anti-money laundering);
- exercise of the rights of the Data Controller, such as the right to defence in court;

Please note that if you are already one of our clients, we may send you commercial communications relating to products/services of the Data Controller, similar to those already acquired by you from our company due to a previous commercial relationship, unless you revoke your consent.

B) For the following Marketing Purposes, subject only to your specific and express consent (Article 7 GDPR):

- newsletters, commercial communications and/or advertising material on products/services offered by the Data Controller and satisfaction level survey on the quality of products/services via e-mail, post and/or sms and/or telephone;
- send third party commercial and/or promotional communications (such as business partners) by e-mail, post and/or sms and/or telephone.



3. Processing methods

Your personal data is processed by means of the operations indicated in Art. 4(2) of the GDPR, such as the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data. Your personal data are subjected to both paper-based and electronic and/or automated processing.

The Data Controller will process personal data for the period of time necessary to fulfill the aforementioned purposes, and no longer than 10 years from the termination of the relationship for the indicated Purposes and no longer than 5 years from the collection of data for Marketing Purposes.

4. Access to data

Your data may be made accessible for the purposes referred to in Art. 2.A. and 2.B.:

- to employees and collaborators of the Data Controller, business partner companies or companies of the SORMA Group in Italy and abroad, in their capacity as authorised or designated persons and/or internal data processing officers;
- to third-party companies or other persons (such as credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, mailing companies, etc.) who are outsourced to carry our activities on behalf of the Data Controller, in their role as external processing managers.

5. Data communication

Without the need for express consent [pursuant to Article 6(b), (c) and f) of the GDPR], the Data Controller may communicate your data for the purposes referred to in Art. 2.A. to Supervisory Bodies, Judicial Authorities, insurance companies for the provision of insurance services, business partners or group companies, as well persons to whom such communication is mandatory by law for the accomplishment of said purposes. These persons will process the data in their capacity as independent data controllers.

Your data will not be disseminated.

6. Data transfer

Personal data are stored on servers of the Data Controller, located in Venice (Italy) and/or on servers located within the European Union belonging to third-party companies who are responsible for and duly appointed as Data Processors. It is understood that, if necessary, the Data Controller will have the right to move the servers outside of the EU. In this case, the Data Controller hereby ensures that the transfer of non-EU data will take place in accordance with the applicable legal provisions, subject to the stipulation of standard contractual clauses as provided for by the European Commission.



7. Nature of providing data and consequences of their non-provision

The provision of data for the purposes referred to in Art. 2.A. is mandatory. Without such data, we cannot guarantee the execution of the contract pursuant to Art. 2.A.

The provision of data for the purposes referred to in Art. 2.B. is optional. You can therefore decide not to provide any data or to subsequently deny the processing of data already provided. In this case, you will not receive newsletters, commercial communications and advertising material regarding the Products/Services offered by the Data Controller. However, it will continue to be apply to the Products/Services referred to in Art. 2.A.

8. Rights of the data subject

In your capacity as a data subject, you benefit from the rights referred to in Art. 15 of the GDPR, namely:

- i. confirmation as to whether or not personal data concerning you are being processed, and their communication in an intelligible form;
- ii. obtain the indication of: a) the origin of personal data; b) the processing purposes and methods; c) the logic applied if processing is carried out with the aid of electronic instruments; d) the identification of the controller, processors and designated representative pursuant to Art. 3, paragraph 1, of the GDPR; e) the persons or categories of persons to whom the personal data may be communicated or may become aware of the data as an appointed representative in the country, designated or authorised persons;
- iii. obtain: a) the update, rectification or, when applicable, the integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; c) an attestation that the operations referred to in letters (a) and (b) have been brought to the attention of those to whom the data have been communicated or disseminated, also as regards their content, except in cases in which such fulfilment proves impossible or involves a use of means manifestly disproportionate to the protected right;
- iv. to oppose the following, in whole or in part: a) for legitimate reasons, the processing of personal data concerning you, even if pertinent to the purpose of its collection; b) the processing of personal data concerning you for the purpose of sending advertising material, direct sales material or for carrying out market research or commercial communications, by e-mail and/or through traditional marketing methods, by telephone and/or post.

Where applicable, you also have the rights referred to in Articles 16-21 of the GDPR (Right of rectification, right to be forgotten, right of limitation of processing, right to data portability, right of opposition), as well as the right to lodge complaints with the Guarantor Authority.



9. Methods of exercising your rights

You can exercise your rights at any time by sending:

- a registered letter to the address of the registered office of the Data Controller;
- an email to dataprotection@sorma.net .

10. Data Controller, Data Processor and Persons authorised to process data

The Data Controller is **SORMA S.p.A.** with headquarters in Mestre (VE), 30174, Via Don Tosatto, no. 8; contact details are provided on the company website at www.sorma.net.

The updated list of data processors and persons authorised to process data is kept at the registered office of the Data Controller.



DISCLOSURE PURSUANT TO ART. 13 EU REGULATION No. 2016/679 (GDPR) Suppliers

The company **SORMA S.p.A.**, with registered office in Mestre (VE), 30174, Via Don Tosatto, no. 8, as the data controller (hereinafter, the "**Data Controller**"), in the person of its **legal representative Sorgato Arturo**, hereby, informs you pursuant to Art. 13 of EU Regulation no. 2016/679 (hereinafter, the "**GDPR**") that your data will be processed in the following manner and for the following purposes:

1. Scope of processing

The Data Controller processes personal data (such as name, surname, company name, address, telephone, e-mail, bank and payment details), hereinafter referred to as "**personal data**" or "**data**", provided by you during the definition of contracts for the products/services of the Controller.

2. Purposes of processing

Your personal data are processed:

A) in compliance with Art. 6(b), (c) and (f) of the GDPR, for the following Purposes:

- execution of the purpose of the contractual relationship to which you are a party, or execution of pre-contractual measures taken upon your request;
- fulfilment of a legitimate purpose of the Data Controller, on condition that such purpose will be not overcome by basic interests, rights and freedoms of the data subject;
- fulfilment of pre-contractual, contractual and tax obligations deriving from relationships in place with you;
- fulfilment of obligations laid down by law, by regulations, by EU legislation or by an order of the Authority (such as that of anti-money laundering);
- exercise of the rights of the Data Controller, such as the right to defence in court;

Please note that if you are already one of our suppliers, we may send you commercial communications relating to products/services of the Data Controller, similar to those already provided by you to our company due to a previous commercial relationship, unless you revoke your consent.

B) For the following Marketing Purposes, only with your specific and express consent (Article 7 GDPR):

- newsletters, commercial communications and/or advertising material on the types of products/services acquired by the Data Controller and Vendor Rating surveys on the quality of supplies/services via e-mail, post and/or sms and/or telephone;
- send third party commercial and/or promotional communications (such as business partners) by e-mail, post and/or sms and/or telephone.



3. Processing methods

Your personal data is processed by means of the operations indicated in Art. 4(2) of the GDPR, such as the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data. Your personal data are subjected to both paper-based and electronic and/or automated processing.

The Data Controller will process personal data for the period of time necessary to fulfill the aforementioned purposes, and no longer than 10 years from the termination of the relationship for the indicated Purposes and no longer than 5 years from the collection of data for Marketing Purposes.

4. Access to data

Your data may be made accessible for the purposes referred to in Art. 2.A. and 2.B.:

- to employees and collaborators of the Data Controller, business partner companies or companies of the SORMA Group in Italy and abroad, in their capacity as authorised or designated persons and/or internal data processing officers;
- to third-party companies or other persons (such as credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, mailing companies, etc.) who are outsourced to carry our activities on behalf of the Data Controller, in their role as external processing managers.

5. Data communication

Without the need for express consent [pursuant to Article 6(b), (c) and (f) of the GDPR], the Data Controller may communicate your data for the purposes referred to in Art. 2.A. to Supervisory Bodies, Judicial Authorities, insurance companies for the provision of insurance services, business partners or group companies, as well persons to whom such communication is mandatory by law for the accomplishment of said purposes. These persons will process the data in their capacity as independent data controllers.

Your data will not be disseminated.

6. Data transfer

Personal data are stored on servers located in Venice (Italy) and/or on servers located within the European Union belonging to third-party companies who are responsible for and duly appointed as Data Processors. It is understood that, if necessary, the Data Controller will have the right to move the servers outside of the EU. In this case, the Data Controller hereby ensures that the transfer of non-EU data will take place in accordance with the applicable legal provisions, subject to the stipulation of standard contractual clauses as provided for by the European Commission.

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The provision of data for the purposes referred to in Art. 2.B. is optional. You can therefore decide not to provide any data or to subsequently deny the processing of data already provided. In this



case, you will not receive newsletters, commercial communications and advertising material regarding the Products/Services offered by the Data Controller. However, it will continue to be apply to the Products/Services referred to in Art. 2.A.

8. Rights of the data subject

In your capacity as a data subject, you benefit from the rights referred to in Art. 15 of the GDPR, namely:

- i. confirmation as to whether or not personal data concerning you are being processed, and their communication in an intelligible form;
- ii. obtain the indication of: a) the origin of personal data; b) the processing purposes and methods; c) the logic applied if processing is carried out with the aid of electronic instruments; d) the identification of the controller, processors and designated representative pursuant to Art. 3, paragraph 1, of the GDPR; e) the persons or categories of persons to whom the personal data may be communicated or may become aware of the data as an appointed representative in the country, designated or authorised persons;
- iii. obtain: a) the update, rectification or, when applicable, the integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; c) an attestation that the operations referred to in letters (a) and (b) have been brought to the attention of those to whom the data have been communicated or disseminated, also as regards their content, except in cases in which such fulfilment proves impossible or involves a use of means manifestly disproportionate to the protected right;
- iv. to oppose the following, in whole or in part: a) for legitimate reasons, the processing of personal data concerning you, even if pertinent to the purpose of its collection; b) the processing of personal data concerning you for the purpose of sending/requesting advertising material or for carrying out market research or commercial communications, by e-mail and/or through traditional marketing methods, by telephone and/or post.

Where applicable, you also have the rights referred to in Articles 16-21 of the GDPR (Right of rectification, right to be forgotten, right of limitation of processing, right to data portability, right of opposition), as well as the right to lodge complaints with the Guarantor Authority.

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You can exercise your rights at any time by sending:

- a registered letter to the address of the registered office of the Data Controller;
- an e-mail to **dataprotection@sorma.net**.



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