



Registered Office - Via Mecenate, 86 - 20138 Milan
Tel. +39 02 58030.1 - Fax +39 02 5063886
www.alcantara.com

PRIVACY POLICY

Alcantara S.p.A. is constantly committed to respecting the privacy of the individuals with whom it comes into contact, in accordance with the provisions of Regulation (EU) no. 679/2016 ("**GDPR**") and the national privacy legislation (Legislative Decree no. 196/2003 and subsequent amendments and additions).

Pursuant to Art. 13 of the GDPR, we hereby provide certain information necessary in order to illustrate how we will use and process the personal data you are providing in filling out the form in the "Contacts" section of our web site (hereinafter, "**Personal Data**" or even just "**Data**").

1. DATA CONTROLLER

The Data Controller is Alcantara S.p.A. (with registered office in Milan at Via Mecenate, 86 - 20138) (hereinafter, "**Alcantara**" or "**We**"), which is responsible for the legitimate and correct processing of your Data.

2. PURPOSE AND LEGAL BASIS FOR PROCESSING OF THE DATA

Your Data will be processed in order to respond to your message and handle any requests or reports submitted by you in filling out the form in the "Contacts" section of our web site (hereinafter, the "**Site**").

The **legal basis** for processing of your Data for the aforementioned reasons is stated, depending on the content of your message, in Art. 6.1 lett. b) of the GDPR, namely our **legitimate interest** in fulfilling your requests sent through the Site, pursuant to Art. 6.1 lett. f) of the GDPR. We believe that none of your rights, interests or fundamental freedoms prevails over such legitimate interest.

3. DATA RECIPIENTS – TRANSFER OF DATA TO OTHER COUNTRIES / INTERNATIONAL ORGANISATIONS

a) SCOPE OF DISSEMINATION OF THE PERSONAL DATA

As part of the Data processing for the purposes indicated in point 2 above, your Personal Data may be disclosed or otherwise made accessible to third parties belonging to the following categories:

- IT consultants and providers of management/maintenance services for the company IT systems, including the Site, also as system administrators;
- providers of electronic mail services;
- press offices.

Where necessary, we will appoint said third parties as our Data Processors, pursuant to Art. 28 of the GDPR.

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Tax code, VAT number and Milan Register of Companies no. 00835580150 - Milan R.E.A no. 850982



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Upon request submitted to us via the contact details indicated under point 6 below, we will provide you with an updated list of the Data Processors that we have appointed.

Your Data will be processed within our company by staff of the relative departments responsible for handling your request. We will duly authorise and instruct all of the aforementioned parties with regard to processing, pursuant to Art. 29 of the GDPR.

b) TRANSFER OF PERSONAL DATA ABROAD

Your Data - limited to the extent necessary to fulfil your request - may be disclosed to staff of our Representative Office in China or to the press offices with which we collaborate and which, depending on the case, could have offices in countries outside of the EEA. In this instance, if the destination country does not benefit from an adequacy decision by the European Commission, the transfer of your Data to the aforementioned entities will be carried out in compliance with the standard contractual clauses approved by the European Commission (in particular, the standard contractual clauses contained in "Set II" of the annex to EU Commission Decision no. 2004/915/EC, available at the following link:

<http://www.garanteprivacy.it/home/provvedimenti-normativa/normativa/normativa-comunitaria-e-intenazionale/trasferimento-dei-dati-verso-paesi-terzi>)

or, alternatively, pursuant to Art. 49, paragraph 1, lett. b) of the GDPR.

4. PROCESSING METHOD – DATA STORAGE PERIOD

The Data will be processed by both paper and electronic means.

The Data will be stored for the period of time strictly necessary to achieve the objective pursuant to point 2 above - namely to accurately manage your message/request, without prejudice to the longer storage times envisaged by law with regard to retention of commercial correspondence.

5. MANDATORY OR OPTIONAL NATURE OF PROVIDING THE DATA - CONSEQUENCES OF REFUSAL

Provision of the Data for the purposes pursuant to point 2 above is a necessary requirement in order for us to respond to your message; therefore, in the event of your refusal, your request cannot be fulfilled.

6. RIGHTS OF THE DATA SUBJECT

Pursuant to Articles 13, paragraph 2, letters b), c) and d), 15, 16, 17, 18, 19, 20 and 21 of the GDPR, we inform you that:

- a) You have the right to request **access** to your Personal Data, together with information on the purpose for their processing, the category of data processed, the subjects or categories of subjects to whom they have been or will be disclosed

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(indicating if such subjects are located in other countries or are international organisations), the storage period and/or the criteria used to determine such a period (where possible), the existence of your rights to amend and/or delete the personal data, limit and oppose their processing, your right to lodge a complaint with a supervisory authority, the origin of the Data and the existence of any automated decision-making process and the logic applied in its application. Should you exercise this right, you will receive an electronic copy of your data that are subject to processing, unless you provide other instructions.

- b) You also have the right to obtain:
- i. **amendment** of your Data, should they be inaccurate or incomplete;
 - ii. **cancellation** of your Data, given one of the conditions set out in Art. 17 of the GDPR (for example: your Data are no longer necessary for the purposes for which they were collected, you decide to withdraw your consent to processing - if this represents the legal basis - and there is no other legal basis for the processing, you object to the processing and the Data Controller has no other legitimate interest, or your Data have been unlawfully processed);
 - iii. **restriction** of the processing of your Data: 1) for the time necessary for Alcantara to ascertain the accuracy of your Data (if you objected); 2) if the processing is unlawful and you request, rather than cancellation, restriction of processing; 3) when Alcantara no longer needs your Data but they are necessary for you to ascertain, exercise or defend a right in court; or 4) for the time necessary to assess the possible prevalence of the Data Controller's legitimate reasons with respect to yours, if you have objected to the processing of your Data pursuant to point c) below;
 - iv. your Data in a format that is structured, commonly used and readable by an automatic device, also in order to send the Data to another data controller, if the processing is based on consent or on a contract and is carried out by automated means (so-called right to **data portability**). If you are interested, you may ask Alcantara to send your Data directly to the other data controller, if technically feasible.
- c) You have the right to **object** to the processing of your Data, if such processing is carried out pursuant to Art. 6.1 letter e) (i.e. to fulfil a legal obligation to which the Data Controller is subject) or letter f) (i.e. to pursue a legitimate interest of the Data Controller) of the GDPR, unless there are legitimate reasons for the Data Controller to proceed with the processing, pursuant to Art. 21 of the GDPR.
- d) If processing is based on Art. 6.1 letter a) of the GDPR, you also have the right to **withdraw the consent at any time**, without jeopardising the lawfulness of the processing of your Data based on the consent and carried out prior to such withdrawal.

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- e) If you are not satisfied with the processing of your data, you may **submit a complaint** to the Data Protection Authority, following the procedures and instructions published on its official website (www.garanteprivacy.it).
- f) We will communicate any amendments or cancellation of your Data or restrictions on processing as per your request - unless this proves to be impossible or requires unreasonable effort - **to each of the recipients** to whom your Personal Data may have been disclosed in accordance with this policy.

Exercising of the above rights is not subject to any restrictions and is free of charge. However, we may need to verify your identity before undertaking any further actions that you may request.

To exercise your rights, you may contact Alcantara by sending a registered letter with return receipt to the contact details specified under point 1 above, or via e-mail to: privacy@alcantara.com.

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