



Sede Direzionale - Via Mecenate, 86 - 20138 Milano

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www.alcantara.com

PRIVACY POLICY

Alcantara S.p.A. is constantly committed to respecting the privacy of 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 Articles 13 and 14 of the GDPR, below we provide you with some information necessary to illustrate how we will use and process the personal data You will provide us directly or which we will acquire from Your company during our commercial relationship (hereinafter the "**Personal Data**" or "**Data**").

Please note that this Policy applies to Personal Data of individuals and sole proprietorship companies that are our customers, as well as to Personal Data of employees of the companies that purchase our products.

1. DATA CONTROLLER

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

2. DATA PROCESSED

The Data we will process include:

- (a) all the Personal Data (such as identifying data, date of birth, contact data - e.g. e-mail, address, telephone number, company You work for, business role, tax code, VAT number) that You will provide us or we will acquire during the negotiation, conclusion and/or execution of the commercial relationship that we will establish with You or with the company You work for, or when completing a purchase at our Concept Store;
- (b) date and time of access to our Milan offices or to our Nera Montoro facility, together with the Data contained in Your identification document, Your vehicle's license plate and the images collected through the video surveillance system installed at our Milan offices.

3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

(a) The Data referred to in paragraph 2 (a) above will be processed:

- i)* to allow us to give the commercial relationship established with You or Your company a full and proper execution, for example in order to create and subsequently manage the customer details within our management system, to give execution to the purchase orders, to carry out after-sales assistance, to handle any complaints, to invoice and obtain the payment of any amounts due.

The **legal basis** for the processing of Your Data for the purpose under *i)* is represented by the need to **give execution to the commercial relationship**

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between us, or between Alcantara and the company You work for, pursuant to Article 6.1 letter b) of the GDPR.

- ii)* to comply with Alcantara's legal obligations under civil, tax and accounting rules (including the obligation to keep accounting records).

The **legal basis** for the processing of Your Data for the purpose under *ii)* is represented by the **need to comply with a legal** obligation to which the Data controller is subject, pursuant to Article 6.1 letter c) of the GDPR;

- iii)* to perform commercial information activities, market research, send promotional or direct sales material, as well as invitations to events, through electronic (e-mail, sms, mms) or traditional tools (operator phone calls, ordinary mail).

The **legal basis** for the processing of Your Data for the purpose under *iii)* is represented by our **legitimate interest** in carrying out direct marketing activities, pursuant to Article 6.1 letter f) of the GDPR, which we believe is not overridden by any of Your rights, interests or fundamental freedoms.

(b) The Personal Data referred to in paragraph 2 (b) above, including Your images acquired through the video surveillance system installed at our Milan office, will be processed to allow You to access to our Milan offices or to our Nera Montoro facility, as well as to carry out access monitoring and to comply with the need to protect company assets.

The **legal basis** for the processing of Your Data for the purpose under this paragraph **(b)** is represented by our **legitimate interest** in protecting the company assets and ensuring a high level of security within Alcantara workplaces, pursuant to Article 6.1 letter f) of the GDPR. We believe that none of Your rights, interests or freedoms prevail over such our legitimate interest.

(c) Moreover, Your Data will be processed for the following additional purposes:

- i)* to allow You to use our company canteen service during Your visits to our offices;

The **legal basis** for the processing of Your Data for the purpose under *i)* is represented by our **legitimate interest** in ensuring Your use of the canteen service (pursuant to Article 6.1 letter f) of the GDPR), which we believe is not overridden by any of Your rights, interests or fundamental freedoms.

- ii)* to ascertain, exercise or defend our rights in court, and to receive tax, legal or notary assistance.

The **legal basis** for the processing of Your Data for the purpose under *ii)* is represented by our **legitimate interest** in exercising or defending our rights in court (pursuant to Article 6.1 letter f) of the GDPR), which we believe is not overridden by any of Your rights, interests or fundamental freedoms.

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4. DATA RECIPIENTS - DATA TRANSFER TO THIRD COUNTRIES/INTERNATIONAL ORGANISATIONS

a) CIRCULATION OF PERSONAL DATA

As part of the Data processing for the purposes referred to in paragraph 3 above, Your Personal Data may be disclosed or otherwise made accessible to third parties belonging to the following categories:

- Alcantara sales agents;
- companies in charge of mass sending of promotional emails and PR companies;
- event organising companies;
- press offices;
- the company in charge of the management of Alcantara Concept Store;
- IT management/maintenance service providers of corporate information systems where the Data will be stored, including system administrators;
- providers of document distribution, archiving and electronic substitution storage services;
- auditing firm and Alcantara Supervisory Body;
- legal, tax and notary advisors;
- companies providing portage service and services for guarding;
- companies responsible for security and video surveillance services;
- in case of emergency, Public Safety Authority;
- suppliers of logistics, warehousing and cargo handling services;
- transport companies (shippers, carriers);
- companies that provide the company canteen service.

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

Upon request addressed to us through the contact details specified in paragraph 7 below, we will inform You of the third parties to which Your Data have been disclosed.

Within our company organisation, Your Data will be disclosed and processed by employees belonging to Sales, Corporate & Communication, General Services, Finance & Control departments as well as by other company departments concerned by the relevant processing of Data. Corporate IT department's employees may also access to Your data. We will duly authorise and instruct these parties with regard to the processing pursuant to Article 29 of the GDPR.

b) TRANSFER OF PERSONAL DATA ABROAD

In case you are invited to participate in corporate events organised abroad, Your Data – to the extent necessary to allow Your participation in the event – shall be communicated to the press offices with which we work or to the companies involved in the event organisation that, as the case may be, could have their offices in countries outside the EEA. We inform

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you that any data transfer of Data to the above companies will be carried out in compliance with the standard contractual clauses approved by the European Commission (the standard contractual clauses contained in "Set II" of the annex to the 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>).

5. DATA STORAGE PERIOD

(i) Data processed for the purposes set out in s 3 (a)(i) and 3 (a)(ii) will be stored in our records for the entire duration of the contractual relationship with You or Your company. At the end of such relationship, Your Data will be kept for a further ten years to comply with the relevant authorities' inspections, current legal civil, tax and contracting obligations and to exercise or defend our rights in court.

Please note that, once our commercial relationship is terminated, the processing of Your Data will be limited to the operations of storage and safe maintenance of such Data, unless they have to be processed differently as part of a legal action or under a legal obligation.

In the event of a dispute, Your Personal Data will be processed will be processed for as long as it will be necessary in relation to such dispute.

(ii) Data processed for the purpose referred to in paragraph 3 (a) (iii) will be stored for five years from the registration in our systems. When the Data pertain to who have purchased our products at the Concept Store, they will be stored in our archives for no more than 24 months from the date of their collection.

(iii) For the purposes set out in paragraph 3(b) above, we inform you that:

- Personal Data relating to accesses to Alcantara offices/facility will be erased after 15 months from their registration;
- Data processed for access monitoring to the Nera Montoro facility (such as identifying Data and Your vehicle's plate number) will be erased every six months;
- the images collected by our video surveillance systems, which may involve You, are stored for up to 24 hours and then automatically erased, unless there is a special need to keep them further due to holidays / to the closure of the offices or to comply with investigative requests from the judicial authority or police, as required by law.

(iv) Personal Data processed for the purpose referred to in paragraph 3 (c)(i) will be stored for a period equal to the fiscal year.

(v) Data processed for the purpose set out in paragraph 3 (c)(ii) will be stored for a maximum of ten years, provided that, in case of a dispute, Personal Data will be processed for as long as it will be necessary in relation to such dispute.

After the storage periods indicated above, Personal Data will be erased.

6. MANDATORY OR OPTIONAL NATURE OF DATA PROVISION - CONSEQUENCES OF ANY REFUSAL

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The provision of the Data for the purposes referred to in paragraphs 3 (a)(i) and (ii) above is a necessary requirement for the conclusion and the execution of our contractual relationship; therefore, in case of Your refusal, we cannot enter into such relationship or perform it.

The provision of the Data for the purposes referred to in paragraph 3 (a)(iii) is optional and you can always oppose the processing of such Data for direct marketing purposes.

In case you do not provide your Data for the purposes set out in paragraphs 3 (b) and 3 (c)(i), you cannot access to our offices/facility or use the canteen service.

7. DATA SUBJECT RIGHTS

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 processing purpose, category of data processed, subjects or categories of subjects to whom it has been or will be communicated (with indication if these subjects are located in third countries or are international organisations), whenever possible the storage period and/or the criteria used to determine such a period, the existence of Your rights to correct and/or delete personal data, limit and object to the processing. You have the right to lodge a complaint with a supervisory authority, to know the origin of the Data, the existence of any automated decision-making and its logic. If You exercise this right You will receive an electronic copy of Your data that are being processed unless You provide us with other instructions.
- b) You also have the right to obtain:
 - i. the **correction** of Your Data, if they are incorrect or incomplete;
 - ii. the **erasure** of Your Data, given one of the conditions set out in Article 17 of the GDPR (for example: Your data are no longer necessary for the purposes they were collected, You decide to withdraw your consent to the processing - if this represents the legal basis - and there is no other legal basis for the processing, You object the processing and there is no other Data Controller's prevailing legitimate interests, Your Data are unlawfully processed);
 - iii. the **restriction** of the processing of Your Data 1) for the time necessary for Alcantara to ascertain the accuracy of Your data (if you objected), or 2) if the processing is unlawful and You request the restriction of related processing instead of the erasure of Your Data, or 3) when Alcantara no longer needs Your Data but they are necessary for You to ascertain, exercise or defend a right in court, or, finally, 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 structured, commonly used and readable by an automatic device, also in order to send the Data to another data controller if the

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processing is based on consent or on a contract and is carried out by automated means (so-called **data portability** right). If You are interested, you can ask Alcantara to send Your Data directly to the other data controller, if this will be technically feasible.

- c) You have the right to **object** to the processing of Your data, if such processing is carried out pursuant to Article 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 Article 21 of the GDPR.
- d) If You are not satisfied with the processing of Your data, You may **lodge a complaint** with the Data Protection Authority following the procedures and instructions published on the official website of this Authority (www.garanteprivacy.it).
- e) Any correction or erasure of Your Data or processing restrictions made upon Your request - unless this proves impossible or involves a disproportionate effort - will be **communicated by us to each of the recipients** to whom your Personal Data may have been transmitted in accordance with this policy.

The exercise of the previous rights is not subject to any form of constraint and is free of charge. We may only ask You to verify Your identity before taking further action upon Your request.

To exercise Your rights, You can contact Alcantara by sending a registered letter with return receipt to the contact details specific in point 1 above or by email writing to the following address: privacy@Alcantara.com.

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