



Sede Direzionale - Via Mecenate, 86 - 20138 Milano
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 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 personal data You will provide us directly or which we will acquire from Your company during our commercial relationships (hereinafter the "**Personal Data**" or "**Data**").

Please note that this Policy applies to Personal Data of individuals (e.g. professionals) and individual companies which are our suppliers as well as to Personal Data of employees of the companies that provide us with products or services.

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. email, address, telephone number, company You work for, business role, tax code, VAT number, bank details) that You will provide us or we will acquire during the negotiation, stipulation and/or execution of the commercial relationship that we will establish with You or with the company you work for;
- (b) date and time of access to our Milan offices or our Nera Montoro facility, together with the Data contained in Your identification document, Your vehicle's license plate, images collected through the video surveillance system installed at our Milan offices;
- (c) if You are an employee of a company in charge of carrying out work or services contracted or subcontracted at the Alcantara offices or facility, Your identification data (such as, identifying data, date of birth, contact details, company You work for, business role and identity document), data concerning Your training in accordance with Legislative Decree no. 81/2008, and some other data relating to Your health (health qualification certificate and data on accidents - hereinafter, jointly, the "**Sensitive Data**");
- (d) Data contained in foreclosures/seizure orders that may be notified to us (such as, identifying data, date of birth, contact details, tax code, VAT number, amount of Your debt).

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If the Data is not directly provided by You, such Data will be communicated to us by the company You work for.

3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

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

- i)* for the research and selection of suppliers, request and comparison of the various commercial offers;

The **legal basis** for the processing of Your Data for the purpose under *i)* is represented by our **legitimate interest** in identifying the supplier which more effectively meets Alcantara's needs and the most advantageous commercial offer for us, 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;

- ii)* for the full and proper execution of the commercial relationship established with You or with the company You work for, for example, to create and manage the supplier details in our management system, to issue purchase orders, verify orders confirmations and to make payments for the supplies;

The **legal basis** for the processing of Your Data for the purpose under *ii)* is represented by the need to **give execution to the commercial relationship** between us, or between Alcantara and the company You work for, pursuant Article 6.1 letter b) of the GDPR.

- iii)* to comply with Alcantara's legal obligations under civil, tax and accounting rules (including, the obligation to keep accounting records and draw up Your CUD - Consolidated Employee Certification, where applicable).

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

(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 set out in paragraph (b) is represented by our **legitimate interest** in protecting the company assets and ensuring a high level of security within Alcantara workplaces pursuant 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) The Personal Data mentioned in paragraph 2 (c) above, including Sensitive Data, will be processed by us in order to verify Your compliance with health and safety in the

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workplace rules in accordance with the applicable legislation (Legislative Decree no. 81/2008) and, consequently, to admit You within Alcantara's workplaces.

The legal basis for the processing of Your Data for the purpose set out in paragraph (c) is the need **comply with a legal obligation** to which the Data Controller is subject, pursuant Article 6.1 letter c) of the GDPR, and with reference to Sensitive Data, the need to comply with legal obligation in relation to employment law and social security, pursuant to Article 9.2 letter b) of the GDPR.

(d) Your Data referred to in paragraph 2 (d) above will be processed to execute any foreclosures/seizure orders which have been notified to us.

The **legal basis** for the processing of Your Data for the purpose set out in paragraph (d) 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, in order to implement judicial measures.

(e) Your Data will be processed for the following additional purposes:

i) for the purposes of either Your or Your company's qualifications in accordance with the policies (including group policies) and with the Alcantara's management systems;

The **legal basis** for the processing of Your Data for the purpose under i) is represented by our **legitimate interest** in qualifying suppliers for safety and quality requirements pursuant Article 6.1 letter f) of the GDPR. We believe that none of your rights, interests or freedoms prevail over such our legitimate interest;

ii) to allow You to use our company canteen service during Your visits at our offices;

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

iii) 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 iii) is represented by our **legitimate interest** in exercising or defending our rights in court (pursuant 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-PARTY 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:

- 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;
- suppliers of logistics, warehousing and cargo handling services;
- transport companies (shippers, carriers);
- museums, facilities hosting Alcantara's exhibitions;
- travel agencies;
- press offices;
- companies providing portage service and services for guarding;
- companies responsible for security and video surveillance services;
- in case of emergency, Public Safety Authority;
- companies that provide the company canteen service.

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

Upon request addressed to us using 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 the employees belonging to General Services, Corporate & Communication, Purchasing, Health, Safety and Environment, Finance & Control, Global Supply Chain, Research and Development and IT. 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 a contact person for important projects (which directly involve You or the company You work for), Your Data may be transferred by us to **Toray Industries, Inc.** and to **Toray International, Inc** which are part of the Toray group (Alcantara majority shareholder) with registered office in Japan, for the purpose set out in paragraph 3 (e)(i). We inform You that any Data transfer to the abovementioned 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:

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

Furthermore, We inform You that in the event in which Your services or Your activities shall be performed outside of the European Economic Area (for example, in the case that You work or cooperate with Alcantara in the organization of an exhibition in a non-EEA country), Your Data may be disclosed to individuals and/or to local companies, involved in various ways in the organization of such exhibition and, consequently, be transferred to countries which do not ensure an adequate level of protection. In this case, without prejudice to the fact that the transfer of Your Data to these countries will be limited to the Data strictly necessary to execute the contractual relationship between us or between Alcantara and the company You work for, such Data will be transferred in accordance with Article 49.1 letter b) of the GDPR as necessary for the execution of a contract. .

5. DATA RETENTION PERIOD

(i) Data processed for the purposes set out in paragraphs 3 (a)(ii) and 3 (a)(iii) will be stored in our records for the entire duration of the contractual relationship with You or with the company You work for. At the end of such relationship, Your Data will be kept for 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 for as long as is it will be necessary in relation to such dispute.

(ii) Data processed for the purposes referred to in paragraph 3 (a)(i) will be used for the entire duration of the selection process and kept in our records for a year from the closing date of such selection process/tender.

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

- Personal Data relating to accesses to the Alcantara offices/facility will be erased after 10 years from their registration in order to ascertain, exercise or defend our rights in court;
- 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 purposes set out in paragraphs 3 (c) and 3 (e)(i) will be subject to the following retention periods:

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- Personal Data that may be stored during the qualification process of our suppliers will be kept for a period not exceeding 10 years, starting from the end of the commercial relationship. This is necessary for checks in the company management systems and for the protection of our rights in court;
- Personal Data of the employees/collaborators of contractors and subcontractors will be kept for a maximum period of 50 years from the contract termination, for the protection of our rights in court or to comply with documentary disclosure requests by INAIL.

(v) Personal Data processed for the purposes referred to in paragraph 3 (e)(ii) will be kept for a period equal to the fiscal year.

(vi) Data processed for the purposes set out in point 3 (d), and 3 (e)(iii) will be kept for a maximum of ten years, provided that, if there is dispute, the Personal Data will be processed for as long as is necessary.

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

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

The provision of Data for all the purposes referred to in paragraph 3 (except for the purposes set out in paragraphs 3 (b) and 3 (e)(ii)) is a necessary requirement for the completion and execution of our commercial relationship; therefore, in case of Your refusal, we cannot enter into such relationship or perform it.

The provision of Your Data for the purposes referred to in paragraphs 3 (b) and 3 (e)(ii) is optional and, failing that, you cannot access to our offices/facility or use our 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-party countries or 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 oppose 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;

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- 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 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 specified in paragraph 1 above, or by email writing to the following address: privacy@alcantara.com.

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