

PRIVACY POLICY
Pursuant to Art. 13 of D. Lgs 196/03 and of the Regulation (EU) 2016/679 on protection of Personal Data (GDPR)

Dear Customer,
General System Pack S.r.l., having its seat in Schio (VI), Italy, Via Lago di Albano n. 82, as a consequence of the obligations established by law and as Data Controller, would like to inform you about purposes and methods of processing your personal data spontaneously communicated in the past and collected in the future, as a result of our business relation.

For the purposes under article 4 of the Italian Privacy Code and article 4(2) of the GDPR, **Processing of Personal Data** includes any operation or multiplicity of operations, made with or without the assistance of electronic or automated tools, concerning the collection, registration, organization, storage, processing, modification, extraction, comparison, communication, dissemination, interconnection, blocking, deletion, destruction and selection of data.

About the treatment that will be carried out, we inform you in particular of the following information:

a. Treatment's Object

The holder processes personal data supplied by you at the end of the contract (name, surname, company name, address, telephone, e-mail, bank and payment details) and whose knowledge and treatment are strictly necessary to fulfill the assigned tasks.

b. Purpose of Processing

Your personal data are treated:

1. Without your express consent (article 24 points a), b) c) of the Privacy Code and article 6 points b), e) of the GDPR) for the following reasons:

- fulfillment of all transactions imposed by legal requirement;
- operations designed to begin contractual relationship;
- acquisition of preliminary information to conclude a contract;
- management of relations with the customer for administration, accounting, orders, shipments, invoicing, services and procedures to settle any disputes.

2. Only with your specific consent (articles 23 and 130 of the Privacy Code and article 7 of the GDPR) for the following marketing purposes:

- send you via e-mail, mail and/or SMS and/or telephone contacts, newsletters, commercial communications and/or advertising material about products or services offered by the company General System Pack S.r.l.

After expressing your consent to paragraph 2. (Marketing) it's however possible to limit your data processing for the mentioned purposes at any time and without any cost.

c. Consequences of a possible refusal to provide these details

A refusal to paragraph b) 1. of data processing, in whole or in part, would facilitate the end of the contract to prevent the realization of an illegitimate treatment. Instead, a refusal to paragraph b) 2. won't have any consequence on the contract execution or continuation.

d. Method of Treatment

Your personal data will be processed to paper, electronic and/or automated treatment in full compliance with the law.

e. Processing Location

Data are currently processed and stored at Data Controller's registered office, based in Schio (VI), Italy, Via Lago di Albano n. 82. Data are also treated, on behalf of the holder, by professionals and/or companies chosen to perform technical, development, management and administrative-accounting activities.

f. Access to Data

Your data may be accessible for the purposes referred to articles 1 point b) and 2 point b) to:

- Data Controller's employees and collaborators (even to non-EU countries) as agents and/or internal processors for the maintenance of general accounting, for invoicing, for credit management, for civil and tax obligations required by law, for the implementation of the contractual obligations and for the updating of personal archives;
- System Administrator;
- Group of Companies which belong to the holder with administrative-accounting purposes;
- Professionals and external consultants who perform on behalf of the holder specific tasks for necessary corporate action, tax and production accounting, market research and marketing activities, those who have been designated for auditing the financial statements, legal and industry consultants, factoring companies, credit institutions, credit insurance companies, commercial information companies, companies operating in the transport sector;
- Public or private bodies, also following inspections or audits such as, for example: Financial Administration, Tax Police, Judicial Authorities, Italian Exchange Office, Labour Inspectorate, Social Security Institutions, Chamber of Commerce, etc.
- Entities that can access to your data in accordance with provisions laid down by law.

The processing of data by third parties will be performed according to correctness and in compliance with the provisions of the law in force.

g. Data retention times

Data will be stored in our archives according to the following parameters:

- 10 years (under article 2220 of Civil Code, except in case of delayed payment which justify its extension) for administration, accounting, orders, budgeting and production process management, assistance and maintenance, shipping, invoicing, services, management of any litigation;
- 24 months for marketing purpose.

h. Data Transfer

To fulfil specific legal obligations or for reasons strictly functional to the contract management and execution, your data may be communicated to service providers located abroad (including non-EU countries). Your data, if transferred to countries outside the European Union, will always be processed following the principles set out in article 46 of the GDPR UE 2016/679.

i. Data Subjects' Rights

As data subject, you may exercise rights under article 7 of the Privacy Code and article 15 of the GDPR UE 2016/679 as:

- obtain confirmation of the existence or not of personal data concerning you (even if not registered yet) and its communication in an intelligible form;
- be informed of: a) personal data's origin; b) purposes and modalities of data processing; c) applied logic in case of treatment carried out with the aid of electronic tools; d) identification details of the holder, managers and representative appointed pursuant to article 5, paragraph 2 of the Privacy Code and article 3, paragraph 1 of the GDPR; e) privacy practitioners who could learn personal data as representative appointed in the State's territory, managers or agents;
- receive: a) updating, rectification or integration of data; b) the cancellation, transformation into anonymised form or blocking data processed unlawfully, including data whose retention is unnecessary;
- the attestation that the operations referred to in letters a) and b) have been made aware, also about their content, of those who receive dissemination and communication of these data, except where this fulfillment proves impossible or involves a use of resources disproportionate to the protected right;
- oppose, in whole or in part: a) to the processing of personal data concerning you for legitimate reasons; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through automated call systems without the intervention of an operator by email and/or through traditional marketing methods by telephone and/or paper mail;
- in specific cases, are also included rights referred to in articles 16 and 21 of the GDPR (right of rectification, right to be forgotten, right to restriction of processing, right to data portability, right of opposition), as well as the right of complaint to the Competition Authority.

j. Holder, Managers and Persons in Charge

The Data Controller is General System Pack S.r.l., based in Schio (VI), Italy, Via Lago di Albano n. 82. The list of Data Processors is kept at the registered office of the Data Controller.

k. How to exercise right

Your rights may be exercised in the following ways:

- Sending a registered letter to General System Pack S.r.l. registered office in Schio (VI), Italy, Via Lago di Albano n. 82;
- Sending an email to privacy@gsp.it.

To improve all your knowledge needed regarding the "Privacy Policy" and to comply with regulatory developments, this Privacy Policy may be subject to changes.

Schio,

GENERAL SYSTEM PACK S.R.L.

After carefully reading the Privacy Policy, we ask you to express your consent or any dissent regarding your data processing for the purposes described above by ticking the appropriate box and to return this form signed by email:

- I do not agree to the processing referred to in b) 1.
- I agree to the processing referred to in b) 2. (marketing purpose)
- I do not agree to the processing referred to in b) 2. (marketing purpose)

Place and Date _____

Customer Stamp and Signature _____