

**Information on the processing of personal data
of Consultants, Clients, Suppliers and their Referents
upon articles. 13 and 14 of the EU Regulation 679/2016 (GDPR)**

LOMBARDINI Srl wishes to inform you that the European Regulation n. 679/2016 provides for the protection of natural persons with regard to the processing of personal data.

Data Controller and Contact Details

The data controller company is LOMBARDINI S.r.l., with registered office in Reggio Emilia - Via Cav. Del Lavoro A. Lombardini n. 2, VAT number/Tax Code 02962900359.

The data controller company can be contacted at the following address: ammdel@pec-lombardini.it.

Data Protection Officer

The role of Data Protection Officer within this organization (Data Protection Officer - DPO) is not foreseen as it is not mandatory under the GDPR.

Purposes of the data processing

Your personal data, as a potential or actual Customer/Supplier/Consultant natural person and/or Contact person of legal entities that have or could have commercial and/or professional relationships with companies of the REHLKO Group, will be processed for the following purposes connected to the implementation of the following obligations, relating to regulatory and contractual obligations:

- 1) Management and execution of the pre-contractual/contractual relationship, including selection and contractualization purposes, execution of activities and contacts useful for carrying out the activities;
- 2) Administrative, fiscal and/or accounting management connected to the contractual relationship, including the management of payments of fees and/or expense reimbursements;
- 3) Management of any disputes connected to contractual/pre-contractual violations;
- 4) Management of company marketing and therefore sending of newsletters, information, promotional and advertising material regarding products and/or services offered by the Controller and the companies of the REHLKO Group, similar to those already purchased by the customer;
- 5) Customer satisfaction analysis, complaints management and corporate and group statistical analysis;
- 6) Fulfillment of legal obligations, connected to tax regulations (e.g. payments of withholding taxes and communications as withholding tax) and/or anti-money laundering regulations.

The purposes mentioned in numbers 2, 4, 5, 6 are not provided for subjects not contracted.

The data processed may concern:

- personal details and contact details (for example: name, surname, place and date of birth, tax code, residence, domicile, even temporary, telephone numbers and email addresses that can be used to carry out activities);
- data and information contained in the curriculum and pertaining to the levels of education, training and professionalism acquired and the possession of the qualifying requirements for the relationship with the Controller company, information relating to company functions useful for qualification processes;
- data contained in expense documents for which you could request reimbursement; only for subjects contracted;
- information and opinions contained in complaints and customer satisfaction assessments; only for subjects contracted;
- any other obligations imposed by current laws and regulations (e.g. documents and information for anti-money laundering purposes); only for subjects contracted.

The processing of data functional to the fulfillment of the purposes listed above is necessary for the correct management of the relationship itself and their provision is necessary to implement the purposes indicated above.

If you represent a legal person, this information obliges you to fully inform your staff of the fact that names, email and telephone numbers may be processed by the undersigned for the management of daily contact activities.

Legal basis of the Processing

With reference to the lawfulness of the processing, it is specified that the legal bases on which the processing of personal data referred to in this information is based consist of:

- As for the purposes referred to in numbers 1) and 2) of this information, the processing is based on the need to execute the contract of which you are a party or to carry out the pre-contractual activities requested by the subjects;

- As for the purposes referred to in number 3), 4) and 5) of this information, the processing is based on the legitimate interest of the Controller in taking care the defenses, in promoting and improving the services
- As for the purposes referred to in number 6) of this information, the processing is based on legal obligations.

Processing methods

The processing of your personal data is carried out by means of the operations indicated in the art. 4 no. 2) GDPR and precisely: collection, recording, organization, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.

Your personal data is subjected to both paper and electronic and/or automated processing.

The data provided will be processed, as well as manually, with the aid of suitable electronic and IT tools and software platforms, equipped with tools capable of guaranteeing their security and confidentiality, in compliance with logic strictly related to the purposes themselves, the modification or unauthorized destruction, always in compliance with logic strictly related to the purposes themselves.

Data retention time

The personal data referred to previous numbers 1, 2, 3, 4, 5, 6, will be retained for the duration of the contractual relationship and for 10 years following this termination.

If the subject is not contracted, the data will be retained for 3 years.

Communication and dissemination of data

Your data will be processed by internal staff expressly authorized and trained by the Data Controller.

Your personal data may be communicated by the Controller company, for reasons of accounting services and payment execution purposes, to banks and credit institutions, public administrations, professional firms of tax and accounting consultants, bodies in charge of auditing and attribution/confirmation of quality certifications as well as to auditors.

Personal data may also be known by communications and software providers, by companies that provide the electronic invoicing and storage service, data centers, as well as IT service providers, for IT security purposes.

Some administrative and accounting services as well as financial supervision are managed by affiliated/parent companies of the REHLKO Group, which may have access to your personal data for the performance of the relevant services; access will be minimized with respect to the purpose.

The Data Processors are appointed in writing by the Data Controller; the list of data processors is constantly updated and available for consultation at the Data Controller.

Transfer of data outside the European Economic Area

Your personal data may be transferred to the holding and affiliates companies of the REHLKO Group outside the European Economic Area both in countries that guarantee an adequate level of data protection (United Kingdom) and in countries that may not guarantee an adequate level of data protection (USA, India), according to the adequacy decisions issued by the European Commission; in the event of transfer to countries that do not guarantee an adequate level of data protection, the Data Controller guarantees that the guarantees provided for by the articles are activated upon art. 46-47-49 of the GDPR.

Automated decision making

Your data will not be included in any automated decision-making process.

Rights of the interested party

- right to ask the Data Controller company for access to personal data, rectification and/or cancellation of the same and/or limitation of the processing concerning it and/or opposition to the processing;
- right to file - in Italy - a complaint with the Privacy Authority for the protection of personal data, following the procedures and indications published on the Authority's official website at www.garanteprivacy.it;
- right to file a complaint with another competent European privacy authority located in the place of habitual residence or domicile in Europe of anyone who disputes a violation of their rights, following the appropriate procedures and indications;

- right to portability of personal data; this right allows the interested party to receive personal data concerning him or her in a structured format, commonly used and readable by an automatic device, and - under certain conditions - to transmit them to another data controller without impediments;
- right not to be subjected to automated decisions, including profiling: the interested party has the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or which significantly affects his rights and freedoms;
- right to withdraw consent, if the processing is based on consent.

All the aforementioned rights can be exercised by the interested party by writing to the PEC address of the Data Controller company and providing an identity document of the legitimized applicant.