CEMBRE

INFORMATION ON THE PROCESSING OF PERSONAL DATA
pursuant to art. 13 of the 2016/679 European Regulation (so-called "GDPR")
- CUSTOMERS AND SUPPLIERS -

1. Identity and contact details of the Data Controller

Pursuant to art. 13 of EU Regulation 2016/679 and Legislative Decree 196/2003, as updated by Legislative Decree 101/2018, ("GDPR"), the company CEMBRE S.pA. ("Owner" or "Company") with registered office in Brescia, Via Serenissima n. 9, as Data Controller of personal data, informs you about the processing of personal data you have provided, or acquired as part of the contractual relationships between the parties, in accordance with current legislation.
The contact details of the Data Controller are as follows: privacy@cembre.com

2. Object of the processing: type of data processed

2.1 The processing we intend to carry out concerns personal data, of which we are or will become aware by virtue of the legal, commercial and contractual relationships in place, and in particular:
a) common personal data: the name;
b) identification data: address, telephone, tax code, VAT number, e-mail, certified e-mail;
c) data collected through tracking pixels embedded in newsletters and commercial and promotional communications, including information relating to the date and time such communications are opened and viewed and, more generally, any interactions with such communications, as well as the device used, IP address, and clicks.

3. Purpose and legal basis of the processing

3.1 Mandatory contribution

Data processing is carried out for the following purposes:
i. carrying out administrative and operational activities, for the fulfillment of accounting, tax, and any other obligations imposed by current legislation;
ii. fulfillment of existing contractual and pre-contractual obligations;
iii. to process the request for contact with one of our sales representatives for the presentation of the products offered by our Company;
iv. claims management;
v. exercise or defense of a right of the Data Controller in court or out of court;
vi. management of any reports made under the "Whistleblowing Procedure" published on the Company's website.

Pursuant to art. 6 par. 1 letter b) and c) of the GDPR, the legal basis for the processing carried out for the purposes referred to in points i., ii., iii, iv. is given by the execution of the contract or pre-contractual measures and the fulfillment of legal obligations. For point v. the legal basis is the legitimate interest of

the Data Controller pursuant to art. 6 par. 1 letter f) GDPR, such as the management of any litigation and credit recovery, directly or through third parties (lawyers, agencies, specialized companies). For point vi. the legal basis for the processing is the fulfillment of a legal obligation pursuant to Article 6(1)(c) of the Regulations, in particular to implement the provisions of Law No. 179 of November 30, 2017 and Legislative Decree No. 24 of March 10, 2023 on the protection of whistleblowers.

The provision of data is mandatory for all the purposes described above: failure to provide data will make it impossible for us to fulfill and respect the commitments undertaken and deriving from the relationships established.

3.2 Further processing purposes: marketing (sending advertising material, direct sales, commercial communication, newsletters)

With your free and optional consent, some personal data (i.e. name, surname, email address) may also be processed for marketing purposes (sending advertising material, direct sales and commercial communication, sending newsletters, monitoring and analysis of user engagement with newsletters, marketing and promotional communications, emails and other digital communications, including by means of tracking pixels), to propose the purchase of products and / or services, present offers, promotions and commercial opportunities and / or initiatives of the Company.

In case of consent, you may at any time revoke the same, making a request in the manner indicated in the following paragraph 6.

On the basis of legitimate interest, we will be able to use the e-mail coordinates provided when purchasing our products, to offer similar products and services even in the absence of prior consent (Article 130 paragraph 4 of Legislative Decree No. 196/2003 and subsequent amendments), without prejudice to the possibility of opposing the sending of further communications.

You may object to the sending of further promotional communications via email by clicking on the appropriate link for the withdrawal of consent, which is present in each promotional email. Once the consent has been revoked, we will send you an e-mail message to confirm the cancellation from our mailing lists. Following the opposition to the sending of promotional communications via email, it is possible that, for technical and operational reasons (e.g. formation of the contact lists already completed shortly before receiving the opposition request) you continue to receive some additional promotional messages. If you continue to receive promotional messages after 7 days have elapsed from the exercise of the right to object, please send a report to the contacts indicated in paragraph 6 below.

3.3 Further processing purposes: profiling

With your free and optional consent, your personal data (i.e. personal and contact data and information relating to the products and services in which you have expressed an interest) may also be processed for profiling purposes, or to reconstruct your preferences and purchasing habits and use of these products and services, in order to be able to send you commercial offers consistent with the profile identified.

In case of consent, you may at any time revoke the same, making a request in the manner indicated in the following paragraph 6.

CEMBRE

4. Methods of data processing

Data processing may consist of their collection, registration, organization, structuring, storage, adaptation, modification, extraction, consultation, use, communication, comparison or interconnection, limitation, cancellation and destruction, in accordance with the provisions of art. 4 n. 2) of the GDPR. It can be carried out both on paper and with the aid of electronic, IT and telematic tools, in a manner and with suitable tools to ensure the security and confidentiality of the data. In particular, all appropriate technical and organizational measures will be adopted to protect data from accidental or unlawful destruction, accidental loss or alteration, unauthorized access, in order to meet the legal requirements and protect the rights of the data subjects.

Contractual, administrative, accounting purposes and compliance with legal obligations: personal data will be retained for the entire duration of the relationship and, thereafter, for 11 years following its termination.

Marketing purposes: personal data processed on the basis of the data subject's consent will be retained for 24 months from the date consent is obtained or from the last meaningful contact/interaction, unless consent is withdrawn earlier.

Profiling purposes: personal data will be retained for 12 months, unless consent is withdrawn earlier.

Use of Artificial Intelligence (AI) Systems

Cembre may use Artificial Intelligence (AI) systems, developed internally or provided by third parties, to support administrative, organizational, commercial, legal, documentary, research, analytical, and business process automation activities. Such tools are used exclusively to assist authorized personnel and do not involve fully automated decision-making processes producing legal effects or similarly significant effects within the meaning of Article 22 of Regulation (EU) 2016/679, unless otherwise specified in a dedicated notice. The accuracy, relevance, and reliability of AI-generated outputs are verified before they are used in decision-making or operational processes.

Where the use of AI systems involves the processing of personal data, Cembre implements appropriate technical and organizational measures to ensure the security, confidentiality, integrity, and availability of the data processed, relying on providers that offer adequate safeguards pursuant to Articles 28 and 32 of Regulation (EU) 2016/679 and, where applicable, Regulation (EU) 2024/1689 (the "AI Act").

Any personal data processed through AI systems are used exclusively for the purposes described in this privacy notice and are not used by Cembre or third parties for the training, development, or improvement of AI models, unless a different legal basis applies and the data subjects have been informed accordingly.

Further information regarding the use of Artificial Intelligence systems may be requested from the Data Controller within the limits established by the applicable legislation.

5. Communication and data transfer

The data being processed will not be disclosed; instead, for the purposes indicated in this information,

they may be disclosed to third parties, including commercial partners, consultants and freelancers, banks and credit institutions, insurance companies, financial, leasing, service, management and credit recovery companies , auditors, public bodies, auditing or supervisory bodies, judicial authority, to fulfill obligations deriving from the law, regulations, community regulations or for aspects concerning the management and execution of the legal relationship existing or existing with the Data Controller. They may also be communicated to the Companies of the Group to which CEMBRE S.p.A. belongs.

The data will be processed by the following subjects:
➢ Employees / Collaborators of the Company, who operate as persons authorized to process data according to the tasks performed and adequately trained.
➢ Data processors pursuant to art. 28 GDPR.
The list of personal data processing managers is available at the registered office of CEMBRE S.p.A.

The Owner declares, pursuant to art. 13 lett. f) GDPR, not to transfer data abroad, with the exception of group companies; should the need arise to transfer data abroad, it will be the duty of the Data Controller to observe the conditions established by the provisions of the privacy legislation in force - in particular art. 46 GDPR - in relation to the transfer of personal data to third countries or international organizations.

6. Rights of the interested party

The interested parties are recognized the rights referred to in Chapters II and III of the GDPR and, in particular, the right to access their personal data, to request their rectification, updating and cancellation, if incomplete, erroneous or collected in violation of the law, as well as to oppose their treatment for legitimate reasons - without prejudice to specific and mandatory legal obligations. You have the right to withdraw the consent given at any time. The withdrawal of consent does not affect the lawfulness of the processing carried out prior to the withdrawal. .

The exercise of rights and requests for information or clarifications may be addressed to the Data Controller CEMBRE SPA, based in Via Serenissima n. 9 in Brescia, in the person of the pro-tempore legal representative, email privacy@cembre.com

For anything not expressly provided for by the provisions referred to here, reference should be made in full to the legislation in force on the subject of privacy.