

CUSTOMER PRIVACY POLICY

Artt. 13 -14 Reg. EU 2016/679 "GDPR"

WHO IS THE DATA CONTROLLER?

The Data Controller is **Gaggiotti Drilling Tools Srl**, Via Francesco Crispi, 20/22, 60027 Osimo (AN), Tel. +39 071 7108171, Email: amministrazione@gaggiotti.com . More information on the website: <https://gaggiotti.com/>

WHICH IS THE AIM OF THIS PROCESSING?

In compliance with EU Regulation 2016/679 on the processing of personal data and their free movement and Legislative Decree 196/2003 as amended "Code on the Protection of Personal Data." We inform you, as a "Data Subject", that we process your data to accomplish the following activities:

- a) contractual, administrative, fiscal and accounting purposes, as well as for an assessment of the quality of the services provided. For the handling of complaints and finally for the response to requests for information forwarded or otherwise required by law.
- b) marketing purposes towards customers, through the same digital communication channel indicated according to the existing relationship, as well as, to send advertising material, promotional and commercial communications related to products marketed by the Data Controller; like those subject to previous sales or services, providing that the interested party does not refuse such use initially or on the occasion of subsequent communications.

In case the need arises to pursue additional purposes of processing your data, which have not been indicated in this notice, we will inform you in advance about the new processing methods.

ON WHAT LEGAL BASIS DO WE PROCESS DATA?

The legal bases vary according to the purposes pursued and stated above, so with reference to the point:

- a) Pursuant to Article 6 GDPR, letters b) and c), the processing is necessary for the performance of a contract to which the Data Subject is a party or for the performance of pre-contractual measures taken at the request of the same, as well as to comply with legal obligations to which the Data Controller is subject.
- b) Pursuant to 'art. 130, co. 4, Legislative Decree 196/2003, the processing is carried out for the purpose of direct sales of its products or services to individuals who are already customers and only for products and services similar to those covered by previous contract, through the same digital communication channel indicated in accordance with the existing relationship.

WHO DO WE COLLECT DATA FROM?

We always collect personal data directly from the Data Subject wherever possible. If necessary, for the purposes of the relationship with the Data Subject, we may make requests to public agencies or perform research of public records and/or databases.

WHAT CATEGORIES OF DATA DO WE PROCESS?

Mainly we require and process only personal data categorized as "common".

The provision of common personal data (appropriately specified during the establishment of the relationship) is mandatory to use our services. In the absence of the same, we will not be able to provide an adequate service; or provide it in the required time; or it may result in the partial, or total, non-performance of the entrusted activity.

WHO DO WE DISCLOSE PERSONAL DATA TO?

The data are processed by authorized personnel at the registered office and operating offices of the Data Controller, in relation to the specific need, as well as at any other location where the parties involved may be in the processing. Your personal data will be disclosed to public bodies and institutions in charge to comply with obligations under laws and regulations. Likewise, your data may be communicated to outside companies that perform outsourced activities on our behalf, duly instructed as Data Processors. These latter are accredited and authorized to process data exclusively for

specific purposes, respecting the protection of personal data. All Data Controllers have been individually identified and have received appropriate instructions to guarantee the rights of Data Subjects.

HOW DO WE PROCESS THE DATA?

Your personal data will be processed using paper and digital systems.

Only personnel authorized by the Data Controller may access your data to carry out processing or systems maintenance operations. We take all useful technical and organizational measures to avoid problems of unauthorized access, disclosure, modification or destruction. We specify that we do not use, within our organization, automated decision-making, including profiling, that produces legal effects that concern you and/or significantly affect you personally.

IS DATA TRANSFERRED TO COUNTRIES OUTSIDE THE EU?

Your data will not be transferred to third countries outside the European Union and with data protection regulations that are not aligned with the EU Regulation 2016/679. Moreover, they will not be subject by us to any dissemination to unauthorized third parties for purposes other than those stated in this policy.

HOW LONG DO WE KEEP DATA?

We will keep your data, provided for the purpose of conducting research and/or selection activities, for the duration of the selection process and, after the conclusion of the selection process, up to 12 months. At the end of the stipulated period, the data will be destroyed, redelivered or processed by ensuring compliance with the principle of minimization, protecting the rights and freedoms of the Data Subject and always storing them with appropriate technical and organizational security measures. As far as commercial communications are concerned, should they be sent on the basis of so-called "soft spam", you always have the possibility to object by sending the appropriate form to the e-mail address amministrazione@gaggiotti.com.

WHAT ARE YOUR RIGHTS?

The Data Subject has the right to request for access to the Data Controller and rectification or erasure of personal data or the restriction of processing concerning him or her or to object to its processing; as well as the right to data portability, in accordance with the GDPR and, therefore, at any time he or she may ask for a digital copy of the data or its automatic transfer to other companies. In the prescribed cases, it may also object to or revoke the consent given. This is without prejudice to the Data Subject's right to lodge a complaint before the Data Protection Authority (www.garanteprivacy.it). Any request to exercise rights will be evaluated within the limits of Articles 23 GDPR and 2-undecies and 2-duodecies Privacy Code. In order to do that or to obtain information on their content, we invite you to send a request by e-mail to the address of the Data Controller, indicated above, using the *"Form for the Exercise of Data Subject's Rights"* provided on the website or at the corporate offices.