

Policy pursuant to Art. 13 of the General Personal Data Protection Regulation (EU) 2016/679

KIMETAL S.r.l. Tax ID Code and VAT number 09147490016, with registered office in Turin, Piazza Crimea no. 7, whose company purpose is: trade, under any form permitted by law, and import and export of mechanical electrical and/or electronic equipment and machines, metals and alloys, construction products and raw materials and finished food-related products, hereby intends to provide you with information on the use of your Personal Data.

CONTROLLER

The Controller is KIMETAL S.r.l. in the person of its legal representative pro-tempore, based in Turin, Piazza Crimea no. 7, CAP 10131, certified [PEC] email kimetalsrl@regmail.it, and email info.gdpr@grupproferrero.com

The Controller has appointed a Data Protection Officer who can be contacted at the address dpo@grupproferrero.com

PERSONAL DATA COLLECTED BY THE USER OR THIRD PARTIES

Depending on the purpose of the processing to be performed and to the extent that it is strictly necessary, KIMETAL S.r.l. collects various types of Personal Data of customers and suppliers, typically general biographical data, contact information and tax data.

Furthermore, KIMETAL S.r.l. uses Personal Data provided by the Data Subject to third parties, for example by companies of the Gruppo Ferrero S.p.a., service providers, or Personal Data in the public domain such as the commonly-recognised Personal Data.

KIMETAL S.r.l. also uses Personal Data provided by the Data Subject as a result of browsing the website (contact form). This data is used to identify users and meet the needs expressed by them when they sent their message. By using the form, users can forward an email without entailing any automatic registration.

Furthermore, KIMETAL S.r.l. uses different types of cookies: these are necessary and functional to the browsing as shown in the cookie policy.

Personal Data is collected on an optional basis or on an obligatory basis. KIMETAL S.r.l. will clearly indicate if the provision of Personal Data is obligatory. If the Data Subject does not provide the obligatory data, it may be impossible for the company to execute the process or activity requested by that Data Subject.

Where KIMETAL S.r.l. indicates certain Data as optional, the Data Subjects are free to refrain from providing such Data, without this in any way affecting the availability of the Service and/or its operation, and/or simply browsing through the website.

LEGAL BASIS AND PURPOSE OF THE DATA PROCESSING

The above-mentioned Personal Data collected by KIMETAL S.r.l. is used on the basis of a lawful justification (legal basis for processing) and for a variety of purposes such as accounting management and corporate taxation, management of commercial relationships and purchase, sale and service contracts, management of all legal requirements and the protection of the company interests.

KIMETAL S.r.l. may collect Personal Data with or without the consent of the Data Subject if:

- 1) it is necessary to fulfil a legal obligation;
- 2) the Data Subject is party to or will be party to a contract;

- 3) there are legitimate interests, public interests or vital interests to be protected that shall prevail over the rights of the Data Subject involved;
- 4) an authority has asked KIMETAL S.r.l. to process the Personal Data.

Purpose of the processing	Legal basis for data processing
Management of contracts with customers and suppliers	Execution of a contract
Respond to the requests made using the contact form	Execution of pre-contractual measures upon the request of the Data Subject
Fulfilment of regulatory requirements, including those for accounting, administrative and tax purposes;	Execution of a contract
Prevention of fraud and criminal offences	Legitimate interest
Ascertain, exercise and protect the company rights or the rights of those represented by the company (e.g. in disputes) before any jurisdiction of any country or even out of court	Legitimate interest

KIMETAL S.r.l. may further process a user's Personal Data if the Data Subject provides their consent for further Data processing for a new purpose that is not compatible with the purposes of the initial collection of Personal Data.

CATEGORIES OF RECIPIENTS TO WHOM THE DATA WILL BE DISCLOSED

The data (or part thereof) collected by KIMETAL S.r.l., within the limits and according to the indicated purposes, may be disclosed to:

- anyone who cooperates with the company for the execution of contractual obligations (by way of example but not limited thereto: shipping/transportation companies);
- public bodies, authorities and/or other entities for the fulfilment of legal obligations;
- third party companies for credit management;
- businesses, companies, individuals, appointed as data processors and/or privacy contacts, which collaborate in the provision of the service on behalf of the Controller and are suitably appointed and instructed; the list of such parties is available at the company's headquarters upon request to be made via email to info.gdpr@gruppoferrero.com, in compliance with the obligation of confidentiality (companies providing IT services, website management, system administration, the accountant).

PROCESSING METHODS, DATA RETENTION AND RELATED CRITERIA

The processing will be carried out using automated and/or manual methods, in compliance with the provisions of Art. 32 of the GDPR 2016/679 in relation to security measures, by specifically authorised and instructed individuals.

The approach of KIMETAL S.r.l. is not to store the Personal Data of the Data Subject for ever. Personal Data is stored by KIMETAL S.r.l. to the extent required and for the sole purpose of pursuing the objectives described above. After the fulfilment of the purposes, KIMETAL S.r.l. will delete the Personal Data, unless their storage is required by law, at a national, European or international level.

The criterion used by KIMETAL S.r.l. to identify the data retention period takes account of the legal retention period (which is often ten years for tax and accounting obligations) and of the limitation period of ten years within which Data Subjects may seek to have their rights upheld with respect to KIMETAL S.r.l.

In the event that KIMETAL S.r.l. collects the data of the Data Subject via a contact request sent by the Data Subject - contact form -, such data will be stored for the period indicated above only if necessary. On the contrary, if the contact was an end in itself, KIMETAL S.r.l. will cancel the email within three months from the last contact with the user.

KIMETAL S.r.l. does not disclose Personal Data to EU or non-EU countries.

RIGHTS OF THE DATA SUBJECT

For questions on the protection of Personal Data or the exercising of one's rights, the Data Subject can contact KIMETAL S.r.l. at any time by writing an email to the following address: info.gdpr@grupproferrero.com

Once Personal Data has been processed, the Data Subject has various rights that may be exercised according to the procedures described below.

A Data Subject must be as precise as possible whenever they wish to exercise their rights, as KIMETAL S.r.l. can only adequately respond to requests which include sufficient details.

KIMETAL S.r.l. will need to verify the identity of the user in a significantly detailed way, to avoid parties other than the Data Subject trying to exercise the rights of the Data Subject. For this purpose, the Data Subject will be asked to provide an identification document that is valid at the time the request is submitted.

Right of access: if a user wants to have access to the Personal Data that KIMETAL S.r.l. is processing or wants further information about:

- purpose of the Processing;
- categories of Personal Data in question;
- categories of recipients to whom the Personal Data has been or will be disclosed;
- the retention period for the Data, or the criteria used to determine such period;
- rights of the Data Subject;
- rights that the Data Subject can exercise with respect to the processing performed by KIMETAL S.r.l.
- the existence of an automated decision-making process, including profiling and the set-out consequences;

and any other available information with respect to the Processing of Personal Data, they must write an email to the following address: info.gdpr@grupproferrero.com

KIMETAL S.r.l. will use the Personal Data submitted by the Data Subject only for verification and to proceed with the Processing of the request.

If the Data Subject exercises the right of access, KIMETAL S.r.l. will provide as comprehensive a list as possible, or a copy of the Personal Data.

Right to integration/rectification/erasure/restriction of processing of Personal Data:

it can happen that some Personal Data held by KIMETAL S.r.l. is not, or has ceased to be, correct. The Data Subject may request the rectification or the integration of their Personal Data at any time.

If the Data Subject wants KIMETAL S.r.l. to delete their Personal Data, the request will be processed, unless there is some impediment or it is incompatible with the law or there are legitimate interests that may be associated with the erasure.

The user can obtain a limitation to the Processing of their Personal Data at any time.

Right to data portability: The Data Subject has the right, in specific circumstances, to receive all the Personal Data provided to us, in a structured commonly-used and machine-readable format. The Data Subject may also ask for the portability of Personal Data to another Controller if technically possible.

Right to revoke consent: every time the user provides KIMETAL S.r.l. with their consent for the Processing of Personal Data, they may subsequently withdraw such consent at any time by following the suggested procedure and with the same ease with which they supplied it, without affecting the lawfulness of the processing based on the consent given before the revocation.

Right to object to the Processing of Data and Processing through automated decision-making systems

The Data Subject has the right to object at any time, for reasons connected with his/her particular situation, to the processing of Personal Data concerning him/her.

The Data Subject has the right not to be subject to a decision based solely on automated processing, which produces legal effects concerning him or her or similarly significantly affects him or her.

The Data Subject may exercise the rights mentioned above via written request to: info.gdpr@gruppoferrero.com

Right to submit a complaint to the supervisory authority: a Data Subject who does not agree with the manner in which KIMETAL S.r.l. provides for the Processing of Personal Data may submit a complaint to the Data Protection Authority in their country of residence.

SECURITY MEASURES FOR THE PROTECTION OF PERSONAL DATA

KIMETAL S.r.l. has implemented appropriate security measures in order to maintain the integrity and security, as well as to prevent the destruction, loss, accidental or unlawful alteration, unauthorised disclosure of, or access to the Personal Data that has been transmitted, stored or otherwise processed in line with Regulation (EU) 2016/679

CHANGES TO THIS POLICY ON DATA PROTECTION

This Policy on data protection can be changed or updated under future laws at an international, European and national level.

The user can always find the latest version of the data protection Policy of KIMETAL S.r.l. on its website.