

INTRODUCTION

The Data Controller is SAOMAD 2 S.R.L., with registered office at Via Frattina 58, 35011 Reschigliano, Campodarsego (PD), Italy, and the following contact address: saomad@saomad.com. In its capacity as Data Controller (hereinafter, the "Controller"), it hereby informs you, pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter, the "GDPR") and in compliance with Legislative Decree No. 196/03 (hereinafter, the "Privacy Code", as amended by Legislative Decree 101/18), that your data will be processed in the manner and for the purposes set out below.

1) Subject matter of the processing

In view of the products and services offered by our organisation, the Controller processes personal identification data and personal data that do not fall within special categories (for example: first name, surname, tax identification number, email address and telephone number; hereinafter, "personal details" or "data") provided by you when requesting services from our organisation and/or when entering into contractual arrangements and/or promotional initiatives, and for the purposes set out below. Some services may require the processing of special categories of data, namely personal data capable of revealing sensitive information such as racial or ethnic origin, membership of political parties, trade unions, associations or organisations of a religious, philosophical, political or trade-union nature, health status and sex life (hereinafter, "special-category data"). Certain legal requirements may also make it necessary to process data relating to criminal convictions and offences.

2) Purposes of the processing and legal basis

Your personal data are processed:

A) Without your express consent, where processing arises from legal and/or contractual obligations or is based on legitimate interests (Privacy Code and Article 6 GDPR), for the following purposes:

- To fulfil pre-contractual, contractual and tax obligations arising from existing relationships with you;
- To comply with obligations laid down by law, regulations, EU legislation or an order issued by an Authority, including accounting and tax obligations;
- To prevent or detect fraudulent activities or harmful misuse and/or for the purposes required by the legislation in force on anti-money laundering;
- To fulfil mandatory requirements arising from organisational and management models based on specific recognised standards (for example ISO, UNI, etc.);
- To comply with requirements imposed by law and/or specific contractual requirements requested by the data subject and/or explicitly stated as requirements of the services;
- To exercise the Controller's rights, for example the right to defend itself in legal proceedings;
- To contact the data subject in connection with the requested services and their management;
- To enable registration for services and the sending of useful information to the data subject in relation to the requested services;
- To process special-category data for the requested services where the processing falls within the cases set out in Article 9(2), letters (b) to (j), of the GDPR.

With regard to data collected through the WEBSITE

- To respond to questions submitted through the contact form;
- To manage and maintain the website;
- To prevent or detect fraudulent activities or harmful misuse of the website. For operational and maintenance purposes, the website and any third-party services used by it may collect system logs, namely files that record interactions and may also contain personal data, such as the user's IP address;
- On the basis of legitimate interests, to send communications, including commercial communications, providing updates on our organisation's initiatives and/or arising from applicable regulatory or legislative requirements.

B) Only with your specific and separate consent (Article 7 GDPR and Legislative Decree 196/03), for the following purposes:

B.1 Marketing and/or commercial purposes: We may send you commercial communications concerning services and products similar to those you have already used, unless you object (Privacy Code). Please note that SAOMAD 2 uses tracking pixels, namely small invisible images contained in email communications, which may be used to monitor the opening of messages for commercial purposes (to analyse the effectiveness of our email campaigns and optimise the quality of their content). You may in any case exercise your right to withdraw consent solely in relation to the deactivation of this tracking system while continuing to receive our newsletters.

For any other purposes, the Controller will provide specific privacy notices and identify the relevant consent requirements and/or any additions required for the processing.

This privacy notice does not cover any processing carried out by other entities that may be reached through links on the website; for such processing, reference must be made to the relevant specific privacy notice.

3) Methods and duration of the processing

Your personal data are processed by means of the operations referred to in Legislative Decree 196/03 and Article 4(2) GDPR, namely: collection, recording, organisation, storage, consultation, processing, alteration, selection, retrieval, comparison, use, interconnection, restriction, disclosure, erasure and destruction of data. Your personal data are processed both on paper and by electronic and automated means. The Controller will process personal data for the time necessary to fulfil the purposes set out above and, in any event, for no longer than 10 years from the termination of the relationship for the purposes referred to in point 2.A, unless otherwise required by law. For the purposes referred to in point 2.B, personal data will instead be processed until consent is withdrawn or for two years after the interruption of the relationship or communications with the data subject, calculated from the first collection of the data.

Profiling: the sending of our commercial emails may involve data profiling through tracking pixels; see point 2.B.1.

4) Access to data

You may access your data at any time by submitting a simple request to the addresses indicated in this privacy notice.

5) Disclosure of data

Your data may be made accessible and/or disclosed for the purposes referred to in points 2.A and 2.B.

Without prejudice to communications and disclosures made in compliance with legal obligations, the Controller may disclose your data, in Italy and/or abroad (as specified in the following points), to:

- Employees and collaborators of the Controller, in their capacity as authorised persons and/or processors and/or system administrators;
- Technicians and/or collaborators responsible for administrative, tax and accounting management and/or for complying with specific legal obligations, including external suppliers appointed for such purposes;
- Our network of agents; factoring companies; credit institutions; debt collection companies; credit insurance companies; business information companies in relation to the requested services; professionals and consultants; companies operating in the transport sector; technicians and collaborators appointed to provide the requested services/products; supervisory bodies; judicial authorities; and any other parties to whom disclosure is mandatory by law for the performance of the stated purposes, as well as legal entities entrusted with the services covered by this privacy notice;
- Companies or other legal entities duly qualified and appointed pursuant to Article 28 of Regulation (EU) 2016/679 for support activities, including the management and development of communications, business processes and projects, communication and promotional systems, and the storage of personal data. Access may be granted to third parties and affiliated companies providing services considered necessary and/or useful by the Controller for the management of business activities and the related support processes, or requested by you. These suppliers include companies maintaining IT systems, credit institutions, professional firms, companies providing services through IT systems or platforms that the Controller considers useful, and companies carrying out outsourced activities on behalf of the Controller in their capacity as external processors;

- Recipients to whom data must be disclosed due to legal obligations and/or the Controller's organisational arrangements, which may involve independent parties that can receive data in order to fulfil legal obligations arising from their role. These recipients may include supervisory bodies, inspectors appointed by third-party entities, persons carrying out audits of our organisation, and persons and/or entities carrying out checks at our premises.

The Controller's partners are not authorised to process data for purposes other than those stated in this privacy notice. Should such processing become necessary, it must be covered by a separate specific privacy notice and by specific consents identifying the relevant controller and purposes.

6) Data transfers

Personal data will be managed and stored on servers located within the European Union and belonging to the Controller and/or to third-party companies duly appointed as processors. Our internal servers are currently located in Europe. The data will not be transferred outside the European Union. It is nevertheless understood that, where necessary, the Controller may relocate the servers to non-EU countries. In that event, the Controller hereby guarantees that any transfer of data outside the EU will take place in compliance with the applicable legal provisions, by entering into agreements ensuring an adequate level of protection and/or adopting the standard contractual clauses approved by the European Commission, where necessary. For certain mailing or storage services, we use cloud platforms that may have servers in non-EU countries; however, data are stored only temporarily for the requested service.

7) Mandatory or optional nature of providing data and consequences of refusal

Providing data for the purposes referred to in point 2.A is mandatory. Without such data, we would be unable to guarantee the services referred to in point 2.A. Providing data for the purposes referred to in point 2.B is optional. You may therefore decide not to provide any data or subsequently refuse the processing of data already provided; in that case, you will not receive commercial communications or advertising material concerning the services offered by the Controller. In any event, you will continue to be entitled to the services referred to in point 2.A.

8) Rights of the data subject

As a data subject, you have the rights provided for by Legislative Decree 196/03 and Articles 15 to 22 GDPR, and in particular the right to:

- A)** Obtain confirmation as to whether or not personal data concerning you exist, even if they have not yet been recorded, and receive such data in an intelligible form;
- B)** Obtain information on: the source of the personal data; the purposes and methods of the processing; the logic applied where processing is carried out with the aid of electronic tools; the identification details of the Controller, the processors and the designated representative pursuant to the Privacy Code and Article 3(1) GDPR; and the entities or categories of entities to whom the personal data may be disclosed or who may become aware of them in their capacity as designated representatives in the territory of the State, processors or authorised persons;
- C)** Obtain: the updating, rectification or, where you have an interest in doing so, supplementation of the data; the erasure, anonymisation or restriction of data processed unlawfully, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed; and confirmation that the operations referred to in points 8.A and 8.B have been brought to the attention, including as regards their content, of those to whom the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right being protected;
- D)** Object, in whole or in part: on legitimate grounds, to the processing of personal data concerning you, even where relevant to the purpose of collection; and to the processing of personal data concerning you for the purpose of sending advertising material, direct sales, market research or commercial communications, through automated calling systems without operator intervention, by email and/or through traditional marketing methods by telephone and/or post. Please note that the data subject's right to object to direct marketing carried out by automated means also extends to traditional means, while the data subject retains the right to object only in part. Accordingly, the data subject may choose to receive only traditional communications, only automated communications, or neither type of communication.

In summary, where applicable under the GDPR, you have the right of access (Article 15), the right to rectification (Article 16), the right to erasure (Article 17), the right to restriction of processing (Article 18), the right relating to the notification obligation (Article 19), the right to data portability (Article 20), the right to object (Article 21), the right not to be subject to automated decision-making (Article 22), and the right to lodge a complaint with the competent Supervisory Authority.

9) How to exercise your rights

You may exercise your rights at any time by sending:

- A registered letter with acknowledgement of receipt addressed to: SAOMAD 2 S.R.L., Via Frattina 58, 35011 Reschigliano, Campodarsego (PD), Italy;
- An email to saomad@saomad.com or a certified email (PEC) to saomad@pec.it;
- The form available at <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924>, completed and sent to the contact details specified above.

10) Children

The Controller's services are not intended for children under the age of 14, and the Controller does not intentionally collect personal information relating to children. If information relating to children is inadvertently recorded, the Controller will delete it promptly at the users' request. Where processing of a child's data is required, specific consent and authorisation will be requested from the person exercising parental authority and/or the holder of parental responsibility, as provided for by Article 8 of Regulation (EU) 2016/679.

11) Controller, processors and authorised persons

The Data Controller is SAOMAD 2 S.R.L., acting through its legal representative from time to time. The Controller may be contacted at the addresses indicated above. The updated list of processors and authorised persons is kept at the Data Controller's registered office.

12) Data Protection Officer

A Data Protection Officer (DPO) has not been appointed, as the relevant requirement does not apply to our organisation.

13) Amendments to this privacy notice

This privacy notice may be amended. You are therefore advised to review it regularly and refer to the most recent version.