



GDPR POLICY - EU Regulation 679/2016

Pursuant to articles 13 and 14 of EU Regulation 679/2016 on the protection of individuals with regard to the processing of personal data, Legislative Decree 24/2023 implementing Dir. EU 2019/1937 "concerning the protection of persons who report breaches of Union law and containing provisions concerning the protection of persons who report breaches of national regulatory provisions", as well as the free movement of such data, the undersigned SIMOL SPA, as data controller, informs that the personal data acquired with reference to the business relationships established will be processed in compliance with the aforementioned legislation; in relation to the aforementioned processing, it also provides the following information.

Data Controller and Data Processor

The identification details of the Data Controller are as follows:

Company name: SIMOL SPA
Legal Representative: SILVANI VITTORIO
Registered office: Via Fiocchetti, 14 Loc. Codisotto – 42045 Luzzara (RE)
Tel.: 0522 976728
E-mail/PEC (certified e-mail): simolspa@pec.it

Personal data collected

The personal data collected is essentially related to:

- identification data;
- data relating to economic and commercial activity;
- personal data, e-mail address and telephone number of your personnel with whom we have business relationships;
- data concerning reports of violations and unlawful acts in accordance with the Whistleblowing procedure.

These data are provided directly by you, or may be collected from independent third-party data controllers.

Processing methods

The personal data will be processed in paper, computerised and telematic form and inserted in the relevant databases that the employees of the commercial area, production, administration, SB and personnel expressly designated by the undersigned as in charge of the processing of personal data will be able to access, and therefore become aware of, and who will be able to carry out consultation, use, processing, comparison and any other appropriate operation, also automated, in compliance with the provisions of the law aimed at guaranteeing, among other things, the confidentiality and security of the data as well as the accuracy, updating and relevance of the data with respect to the declared purposes.

Processing purposes

The purposes of the processing of personal data are as follows:

1. execution of the contracts entered into with you and the related commitments;
2. fulfilment of legal obligations related to the contractual relationship;



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3. organisational and commercial management of the contract;
4. protection of contractual rights;
5. internal statistical analysis;
6. marketing activities through the sending of promotional and advertising material relating to products or services similar to those covered by the existing commercial relationship;
7. Solvency information;
8. detection of wrongdoing and violations.

Legal basis of processing

Pursuant to article 6, the data are processed on the basis of the consent expressed by the interested party. Alternatively or in addition to consent, the processing is carried out in order to fulfil a contractual/pre-contractual or legal obligation, to protect the vital interests of the interested party or third parties, to execute a public interest or exercise of public powers, or to pursue the legitimate interest of the data controller or third parties, provided that the interests or the fundamental rights and freedoms of the interested party that require the protection of personal data do not prevail.

Nature of data conferment

The provision of data and its processing are mandatory in relation to purposes no. 1, 2, 4 relating to contractual and legal obligations; the provision is also to be considered mandatory in relation to purpose no. 3, which refers to the performance of all the activities of the undersigned necessary and functional to the execution of contractual obligations; it follows that any refusal to provide data for these purposes may determine the impossibility of the undersigned to carry out the contractual relationships and legal obligations.

The provision of data and processing thereof is to be considered optional in other situations.

Recipients of personal data

In relation to the purposes indicated in points 1, 2 and 4, the data may be communicated to the following subjects or categories of subjects indicated below:

1. Transport companies and freight forwarders for aspects related to the shipment of goods and customs procedures;
2. Banking institutions for the management of collections and payments;
3. Financial administrations and other companies or public bodies in compliance with regulatory obligations;
4. Companies and law firms for the protection of contractual rights.

For purpose no. 3, the data may be disclosed to agents, representatives, brokers working for the undersigned, contractors or self-employed companies and client companies.

For purpose no. 5, there is no provision for the communication of data without prejudice to the disclosure of statistics in aggregate and anonymous form.

For purpose no. 6, it is not generally provided for the communication of data externally without prejudice to the communication to agents or representatives of the undersigned who will take care of the presentation or sending of the material in situations already authorised by the customer with the expression of consent.

For purpose no. 7, the data may be communicated to agencies and commercial information companies. For purpose no. 8, the data will be collected by the SB and may be disclosed to legal advisors.

Furthermore, personal data may be communicated to other subjects where the communication is imposed by a legal or contractual obligation or is necessary for the purpose of concluding a contract. Personal data will not be disclosed.

Transfer of data to a country not belonging to the European Union or to an international organisation

With reference to the purposes referred to in points 1, 2, 3, it is hereby informed that the personal data of the interested party may be transferred outside the territory of the European Union with specific consent of the interested party.

In the absence of consent, the data may be transferred to third countries in relation to which there is an adequacy decision of the EU Commission pursuant to article 45 or adequate guarantees are provided pursuant to article 46 of Regulation 679/16.

Data retention period

The personal data is kept for the time strictly necessary to carry out the purposes of the processing and, therefore, varies in consideration of each specific purpose.

The Data Controller may retain some data even after the termination of the contractual relationship, for the time necessary for contractual and legal obligations.

Rights of data subjects

In relation to the aforementioned processing, the data subject may exercise, at any time, the following rights referred to in EU Regulation no. 679/2016:

Interested party's right of access (*article 15*)

Right to rectify incorrect data and integration of incomplete data (*article 16*)

Right to erasure of personal data (*article 17*)

Right to restriction of processing (*article 18*)

Right to portability of personal data (*article 20*)

Right to object (*article 21*)

Right to complain with the supervisory authority (*article 77*)

The rights are asserted in compliance with the conditions and limits provided for pursuant to articles 12 and 23 of the regulation.

Further information regarding the processing and communication of data provided directly or otherwise acquired may be requested from the Marketing Office, at the company's headquarters.

This notice naturally does not exclude that other information may also be given verbally to interested parties at the time of data collection.