

## EURO-GROUP.IT WEBSITE PRIVACY POLICY PURSUANT TO ART. 13 AND 14 OF REGULATION (EU) 2016/679 ("GDPR")

|   | JOINT CONTROLLERS             | 1. E.M.S. EURO MANAGEMENT SERVICES S.p.A., via Trivulzio, 1, 20146 Milan, Italy  2. EURO GROUP LAMINATIONS S.p.A. via Trivulzio 1, 20146 Milan, Italy  3. CORRADA S.p.A. via Michelangelo Buonarroti 8, 20020 Lainate (MI) Italy  4. EUROTRANCIATURA S.p.A. Società Unipersonale via Stella Rosa 48/50, 20021 Baranzate (MI) Italy  5. EUROSLOT TOOLS S.r.l., via De Gasperi 10, 20066 Melzo (MI), Italy  6. SAF S.p.A. via Industriale 14 - 25080 Muscoline (BS), Italy  E-mail: privacy@euro-group.it  Hercinafter also referred to individually as "Company" or "Controller" and jointly as "Joint Controllers". |
|---|-------------------------------|---|
| Ť | DATA PROTECTION OFFICER (DPO) | E-mail: dpo@euro-group.it   |

### PERSONAL DATA PROCESSED

In the course of browsing the website **euro-group.it** ("**Site**"), we collect various personal data to fulfill the processing purposes listed in the following paragraphs.



In particular, we process common data, including technical navigation data, acquired by the information systems and software procedures relied upon to operate the Site itself, as part of their standard functioning. These personal data, whose transmission is an inherent feature of Internet communication protocols, are not collected in order to be associated with identified data subjects but, by their very nature, they could allow users to be identified through the processing and association with data held by third parties. This category of data includes IP addresses, domain names of the computers used by users connecting to the Site, URI (Uniform Resource Identifier) notation addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code relating to server response status (successfully performed, error, etc.) and other parameters relating to the user's operating system and IT environment.

These data, necessary for the use of web services, are also used to obtain anonymous statistical information on the use of the Site as well as to check its correct functioning and are deleted immediately after processing. The data may also be used to ascertain liability, should criminal offences be committed or attempted against the Site.

This Site uses cookies and similar technologies: for further details please refer to the Cookie Policy available at the present link.

The Joint Controllers also process data directly provided by the user by filling specific forms on the Website (by way of example but not limited to: "Contact" area and "Careers" area). In relation to such processing of personal data, you can find a dedicated information notice pursuant to Article 13 GDPR in the aforementioned sections.



| PURPOSE OF PROCESSING   | LEGAL BASIS FOR PROCESSING  | DATA RETENTION PERIOD   |
|---|---|---|
| Technical administration and management of the operation of the Site.   | Performance of the contract to which the data subject is party pursuant to Article 6.1(b) of the GDPR (navigation on the Site). | For the duration of browsing.   |
| Fulfilment of obligations or exercise of rights under applicable national and supranational legislation.              | Fulfilment of a legal obligation to which the data controller is subject, pursuant to Article 6.1(c) of the GDPR.               | For the time required by the specific provisions of the sector.   |
| If necessary, ascertainment, exercise or defence of the Controller's rights in judicial or extrajudicial proceedings. | Legitimate interest for common data pursuant to Article 6.1(f) of the GDPR.   | For the entire duration of the litigation or extrajudicial proceedings, until the time limits for appeal have been exhausted. |

Once the aforementioned retention periods have expired, the Data will be destroyed or anonymised, in line with the technical procedures for deletion and backup and with the accountability requirements of the Controller.

#### PROVISION OF DATA



Browsing data are necessary in order to carry out IT and telematic protocols underlying the operation of the Site; therefore, failure to provide them would not allow the Site to function.

As regards the data required within specific sections of the Site (e.g. "Career"), please refer to the appropriate information notice.

# AUTHORIZED SUBJECTS



Personal data may be processed by the employees of the Company functions deputed to the pursuit of the aforementioned purposes, who have been expressly authorised to process the data and who have received adequate operating instructions pursuant to art. 29 of the GDPR and 2 quaterdecies of Legislative Decree 196/2003, as amended and adapted by Legislative Decree 101/2018.

### THIRD PARTIES



The user's data may be communicated to subjects acting as controllers, such as, by way of example:

- a. Authorities and supervisory and control bodies (e.g. Agenzia delle Entrate, Guardia di Finanza);
- b. persons, companies, associations or professional firms providing assistance and consulting services, and in general by public and private subjects entitled to request the data.

The user's data may be processed, on behalf of the Controller, by parties appointed as data processors, including, by way of example, companies that perform management and/or maintenance services for the Site.

The full list of data processors is available on request by contacting privacy@euro-group.it

## TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES (EXTRA-EU)

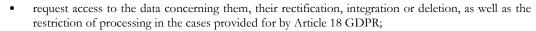


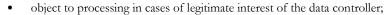
There are no transfers of data outside the European Union.

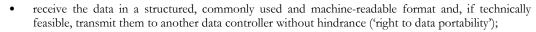


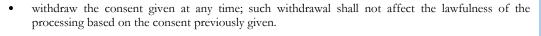
# DATA SUBJECT'S RIGHTS - COMPLAINT TO THE SUPERVISORY AUTHORITY

By contacting the Company at <u>privacy@euro-group.it</u>, or the DPO at <u>dpo@euro-group.it</u>, data subjects may:









Data subjects also have the right to lodge a complaint with the competent supervisory authority (Italian Supervisory Authority).

