

## Information notice on the processing of personal data pursuant to Regulation (EU) 2016/679 ("GDPR")

### Privacy policy of the website "eglagroup.com"

#### DATA CONTROLLER

The data controller is the natural or legal person that decides how to use the personal data collected and for what purposes.

Each Company acts as an autonomous data controller. The drafting of a joint information notice is therefore exclusively due to a simplified organisational approach adopted by the Group: there is in fact no joint controllership among the Companies.

- E.M.S. EURO MANAGEMENT SERVICES S.p.A.**  
Via Trivulzio 1, 20146, Milan, Italy
- EUROGROUP LAMINATIONS S.p.A.**  
Via Stella Rosa 48/50, 20021, Baranzate (MI), Italy
- CORRADA S.p.A.**  
Via Michelangelo Buonarroti 8, 20020, Lainate (MI), Italy
- EUOTRANCIATURA S.p.A.**  
Via Stella Rosa 48/50, 20021, Baranzate (MI), Italy
- EUROSLT TOOLS S.r.l.**  
Via De Gasperi 10, 20066, Melzo (MI), Italy
- SAF S.p.A.**  
Via Industriale 14, 25080, Muscoline (BS), Italy
- DS4 S.r.l.**  
Via Giardini 32, 24066, Pedrengo (BG), Italy
- EURO AUTOMATION S.r.l.**  
Via Moriggia 14, 20900, Monza (MB), Italy

Each of which is hereinafter referred to as "Company" or "Controller" and can be contacted via e-mail at [privacy@eglagroup.com](mailto:privacy@eglagroup.com).

#### DATA PROTECTION OFFICER

The DPO is the party, designated by the data controller, who supports the latter in monitoring compliance with the GDPR, in raising awareness and providing information, as well as in other activities required by law, and acts as a point of contact for data subjects and supervisory authorities.

The Data Protection Officer can be contacted via e-mail at [dpo@eglagroup.com](mailto:dpo@eglagroup.com).

#### PERSONAL DATA PROCESSED

"Personal Data" means any information relating to an identified or identifiable natural person (defined as "data subject"); an identifiable natural person is one who can be directly or indirectly identified. Personal data may be "common" data (such as name, surname, e-mail address, IBAN, etc.) or special categories of personal data (data that, by their very nature, require the implementation of special safeguards).

When browsing the [eglagroup.com](http://eglagroup.com) website ("Site"), the computer systems and software procedures used to operate the Site acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.

This is information that is not collected in order to be associated with identified data subjects but which, by its very nature, could allow users to be identified through processing and association with data held by third parties. This category of data includes IP addresses, the domain names of the computers used by users connecting to the Site, the URI (Uniform Resource Identifier) notation addresses of the resources requested, 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 indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer 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.

In addition, the Controller collects personal data provided by you when sending inquiries by using the contact information available on the Site (e.g., email and telephone number).

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

The Controller also processes data directly provided by you when filling specific forms on the Site (by way of example but not limited to: "Message Us" area). In relation to such processing, you can find dedicated information notices, pursuant to Article 13 and 14 GDPR, in the aforementioned sections.

 <b>PURPOSE OF PROCESSING</b> <i>The personal data provided are processed for the various purposes indicated in this column: they specify the objective of the processing.</i> <i>Each purpose is associated with a legal basis for processing and a retention period, which are specified on the right.</i>	 <b>LEGAL BASES FOR PROCESSING</b> <i>The legal basis is the condition that makes the data processing lawful; the legal bases are defined by the GDPR and can be, by way of example, consent of the data subject, performance of a contract, and compliance with a legal obligation. In this column, you can find the legal basis associated with each purpose of processing.</i>	 <b>DATA RETENTION PERIOD</b> <i>Personal data may only be processed for the period of time necessary to achieve the purpose for which it was collected.</i> <i>In this column, you can find the data retention period associated with each purpose of processing.</i>
Purposes connected with or instrumental to the <b>technical administration and management of the functioning of the Site</b> .	Performance of the contract to which the data subject is party or performance of actions at the request of the data subject prior to entering into a contract, pursuant to Article 6.1(b) of the GDPR (browsing of the Site).	For the duration of browsing.
<b>Respond to inquiries about the Company</b> and/or their products and services submitted by you via e-mail or telephone contact.	Performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, pursuant to Art. 6.1(b) GDPR.  Legitimate interest in the retention of data by the Controller (processing and follow-up of the request) pursuant to Article 6.1(f) GDPR.	For the time required to process the request and thereafter for a period of 3 years.
<b>Comply with the obligations and exercise the rights of the Company or the data subject</b> under applicable national and supranational legislation.	Compliance with a legal obligation to which the Data Controller is subject, pursuant to Article 6.1(c) of the GDPR.	For the period of time required by the applicable law.
If necessary, to <b>ascertain, exercise or defend the Data Controller's rights</b> in judicial or extrajudicial proceedings.	Legitimate interest of the Data Controller for common data pursuant to Article 6.1(f) of the GDPR.	For the entire duration of the judicial or extrajudicial proceedings, until the time limits for appeal have been exhausted.
After the aforementioned retention periods have elapsed, the Data will be destroyed or made anonymous, depending on the technical deletion and backup procedures and the accountability requirements of the Data Controller.		



## PROVISION OF DATA

*For some processing purposes, it is necessary for you to provide your data – without which it would not be possible to pursue the purpose of the processing. For other purposes, provision of the Data may be optional.*

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

Data provided when sending inquiries by e-mail or through telephone contact are necessary to follow up on your information requests.



## DATA RECIPIENTS

*In order to pursue the purposes of processing outlined in this information notice, the Controller may transmit some of your data to external parties who act as data controllers and/or processors.*

*A data processor is a natural or legal person that processes data on behalf of the controller: the purposes and means of processing are always determined by the data controller.*

Your data may be communicated to subjects acting as **data controllers**, such as, specifically:

- a. companies in the Group;
- b. authorities and supervisory and control bodies (e.g. Agenzia delle Entrate, Guardia di Finanza), and in general by public and private subjects entitled to request the data.

Your 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 complete list of data processors is available, upon request, by contacting the e-mail address [privacy@eglagroup.com](mailto:privacy@eglagroup.com)



## PERSONS AUTHORISED TO PROCESS

*Personal data protection legislation requires that the persons authorised to process personal data be identified and given specific instructions regarding the processing.*

The data may be processed by the employees of the company functions tasked with the pursuit of the aforementioned purposes, who have been expressly authorised to process the data and who have received adequate operating instructions pursuant to Article 29 of the GDPR and Article 2-quaterdecies of Italian Legislative Decree 196/2003, as amended and adapted by Italian Legislative Decree 101/2018.



## TRANSFER OF PERSONAL DATA to NON-EU COUNTRIES

*Personal data benefit from specific safeguards within the European Union. For this reason, the GDPR requires that data subjects be informed of any transfer of data outside the Union. Such transfers must be accompanied by additional safeguards.*

There are no transfers of data outside the European Union.



## RIGHTS OF THE DATA SUBJECT and COMPLAINT TO THE SUPERVISORY AUTHORITY

*The GDPR grants various rights to the data subject, which must be made known by the data controller through the information notice on the processing of personal data, in a concise, transparent, intelligible and easily accessible form.*

By contacting the Company via e-mail at [privacy@eglagroup.com](mailto:privacy@eglagroup.com) or the DPO at [dpo@eglagroup.com](mailto:dpo@eglagroup.com), data subjects may request access to the data concerning them, their rectification, integration or erasure, as well as the restriction of processing in the cases provided for by Article 18 GDPR. Data subjects may also object to the processing in cases of legitimate interest of the Data Controller pursuant to Article 21 GDPR.

Where processing is based on consent or on the performance of a contract and is carried out by automated means, data subjects have the right to receive the data in a structured, commonly used and machine-readable format and, if technically feasible, to transmit them to another data controller without hindrance.

Finally, data subjects have the right to lodge a complaint with the competent supervisory authority.