



PRIVACY NOTICE
pursuant to Article 13 of EU Regulation 679/2016 and Legislative Decree 196/2003, as amended (Privacy Code)

Dear Supplier,

We wish to inform you that EU Regulation 679/2016 (and Legislative Decree 196/2003, as amended) provide for the protection of natural persons with regard to the processing of personal data. In accordance with these regulations, the processing will be based on the principles of fairness, lawfulness, and transparency, safeguarding your privacy and your rights.

Pursuant to the aforementioned Article 13 of EU Regulation 679/2016 and Legislative Decree 196/2003, as amended, we therefore provide you with the following information:

a) The processing that the Data Controller may carry out will be performed through automated processes and/or the collection of paper documentation and is carried out for the following purposes:

- establishing and managing the business relationship and related organizational activities;
- provision of services/purchase of goods, which are the subject of the business relationship established with the data controller;
- management of related pre-contractual, contractual, post-contractual, administrative, accounting, tax, and legal obligations.

The personal data collected and processed by the Data Controller includes the following: business name or company name, registered office, telephone number, fax number, email address, bank details, accounting and tax information, etc. You provided this personal data voluntarily at the time of the purchase order, or it may be collected from independent third-party data controllers (such as, for example, from our sales network of agents and representatives for data relating to contracts and orders, etc.).

b) The provision of data is mandatory for the purposes set forth in letter a), and failure to provide such data may make it impossible to establish the business relationship; the processing is not based on the grounds set forth in Article 6(1)(f) of EU Regulation 679/2016;

c) Your personal data will be processed by individuals specifically appointed by the data controller as data processors and/or by anyone acting under the data controller's authority who has access to personal data; such individuals will process your data only when necessary in relation to the purposes of the data collection and only within the scope of performing the tasks assigned to them by the data controller, undertaking to process only the data necessary to perform such tasks and to carry out only the operations necessary for their performance.

Furthermore, your personal data may be disclosed for the purposes referred to in paragraph a) to:

- external companies or professionals who perform specific tasks on behalf of the data controller (including, but not limited to, data processing, assistance, consulting, in the administrative, accounting, tax, legal, regulatory, and management/maintenance/implementation of corporate information systems fields, as well as supervisory and oversight bodies, transportation and shipping companies, etc.) only if the disclosure of your personal data is necessary or otherwise functional to the pursuit of the purposes referred to in paragraph a);
- agents/consultants, brokers, and collaborators/partners of the data controller, only if the disclosure of your personal data is necessary or otherwise essential for the purposes set forth in paragraph (a);
- law firms and attorneys, for the possible protection of contractual rights;
- financial institutions, and where necessary, to financial, leasing, debt collection, credit protection, and credit assignment companies, for the management of financial transactions;
- Central and local government bodies, public entities, and other institutions for legal obligations;
- parent companies, subsidiaries, or affiliates of the data controller;
- insurance companies and/or insurance brokers, only if the disclosure of your personal data is necessary or otherwise functional to the purposes set forth in paragraph a).

The disclosures of data described above are, depending on the case, related to specific legal or contractual obligations, or are necessary for the conclusion of the contractual relationship, or are strictly related to normal business operations within the scope of managing the established contractual relationship, and are strictly necessary for the purposes referred to in paragraph a); therefore, failure to provide such data may make it impossible to establish the contractual relationship.

c1) The Data Controller may transfer personal data to a third country or an international organization; in such cases, the Data Controller undertakes to process the data only if appropriate safeguards are in place;

c2) In compliance with the Provision "Measures and precautions required of data controllers processing data by electronic means regarding the assignment of system administrator functions – November 27, 2008" (Official Gazette No. 300 of



December 24, 2008) and related additions and amendments, the data controller has appointed specific "**System Administrators**" who, in the course of performing their duties, may access, even indirectly, services or systems that process or enable the processing of personal information.

c3) The data will not be disclosed to other third parties unless we first obtain your express consent.

Your personal data will not be disclosed.

d) The data will be retained for the time necessary to achieve the purposes indicated above and to comply with sector-specific regulatory obligations; the retention period will be determined by the duration of the business relationship and by administrative, accounting, and tax obligations, but in any case for a maximum of 10 years following the termination of the relationship, until the expiration of the statute of limitations on the rights arising between the parties. In the event of legal proceedings, for the entire duration thereof, and until the final judgment becomes binding.

e) The personal data provided will not be processed for the purpose of automated decision-making (so-called profiling).

f) In the event that the personal data provided must be processed for purposes other than or in addition to those indicated above, the Data Controller will provide you with information regarding such different purposes and any further relevant information.

g) The supplier is hereby informed that, should it engage its own employees or collaborators (including any subcontractors) in the performance of the contractual relationship, the personal data of such individuals may be processed by Decoart S.r.l., acting as the data controller, for the purposes set forth in point a). Such processing has the same purposes, methods, and data retention periods as described in this privacy notice; furthermore, with respect to such processing, data subjects have the same rights identified in this privacy notice. The supplier is responsible for properly informing its employees and collaborators regarding the aforementioned processing, including by providing them with this privacy notice.

The Data Controller, taking into account the state of the art and the costs of implementation as well as the nature, scope, context, and purposes of the processing both when determining the means of processing and at the time of the processing itself (so-called risk analysis - *accountability*), has implemented appropriate technical and organizational measures aimed at effectively implementing data protection principles and incorporating the necessary safeguards into the processing to meet the requirements of EU Regulation 679/2016 and protect the rights of the data subject.

Accordingly, personal data will be processed for purposes related to and/or instrumental to the established commercial/professional relationship, in accordance with the aforementioned objectives. Data processing will be carried out using methods and tools suitable for ensuring security (Articles 24, 25, and 32 of EU Regulation 679/2016) and will be performed through automated processes and non-automated means (paper-based records), to which all technical and organizational measures necessary to ensure a level of security appropriate to the risk will be applied, so as to guarantee, on a permanent basis, the confidentiality, integrity, availability, and resilience of the processing systems and services (by way of example but not limited to: controls on both the assignment of tasks to data processors and the classification of the data itself; procedures, where feasible, for pseudonymization and encryption; disaster recovery mechanisms, etc.).

We hereby inform you that, in accordance with the combined provisions of Article 4(11) and Article 6(1)(b) of EU Regulation 679/2016, the processing of the personal data provided is necessary (and therefore lawful) for the performance of the existing commercial/professional relationship between the Parties, and that your receipt of this notice constitutes your consent through a positive and unequivocal action to the processing described above (Article 7 of EU Regulation 679/2016).

The data controller is: **DECOART S.R.L.**, with registered office at Via G. Maggi 2, 21030, Cuvio (VA), Tax ID/VAT No. 03911400962, Tel. +39 0332 658311, Fax Italy +39 0332 651135, Fax export +39 0332 658379, Website www.modectoritaliana.it/en, www.ambras.it/en, e-mail: privacy@decoartitalia.it, Certified Email (PEC): Decoart srl@pec.it (hereinafter referred to as the "Data Controller").

The Data Controller, in order to ensure compliance with the GDPR and the laws applicable to the processing of the data subject's personal data, has appointed an independent third party as Data Protection Officer (DPO pursuant to Art. 37 of Reg. EU 679/2016 and Article 29 Working Party Guidelines of December 13, 2016), namely the company GRCTeam S.r.l., with registered office at Via Sigismondi No. 40 - 24018 Villa D'Almè (BG) (Tax ID and VAT No. 04141040164), Tel. 035 636029 - Certified Email: grcteam@legalmail.it - email: dpo@grcteam.it, whom you may contact for any information and/or request and/or complaint via the communication channels indicated above.

Pursuant to Article 28 of EU Regulation 679/2016, the Data Controller may engage third parties to process data on its behalf, who are formally appointed by the Data Controller as data processors. The Data Controller will provide you with a complete and up-to-date list of designated data processors upon your request by sending a message to the contact details provided above. Pursuant to Article 29 of EU Regulation 679/2016, the Data Controller may rely on any person acting under its authority and/or the appointed data processor; such persons will be duly instructed.

The Data Controller also informs you that:

h) the data subject has the right to request from the Data Controller access to their personal data and the rectification or erasure of such data or the restriction of processing concerning them, or to object to their processing, in addition to the right to data portability (Art. 15, Art. 16, Art. 17, Art. 18, Art. 20 of EU Regulation 679/2016); by



exercising the right of access, the data subject has the right to obtain from the data controller confirmation as to whether or not personal data concerning him or her are being processed, while the exercise of the right to data portability allows the data subject to obtain from the data controller the personal data in a structured, commonly used, and machine-readable format, or the transfer of such data from the original data controller to another (see WP 242 of 13.12.2016);

- i) The data subject has the right, where the processing is based on Article 6(1)(a) or Article 9(2)(a), to withdraw consent at any time without affecting the lawfulness of processing based on consent given prior to withdrawal;
- j) the data subject has the right to lodge a complaint with a supervisory authority;
- k) the data subject has the right to be informed by the Data Controller, who must do so without undue delay, of a personal data breach likely to result in a high risk to the rights and freedoms of natural persons (Art. 34 of EU Regulation 679/2016).

The full text of the articles of EU Regulation 679/2016 relating to your rights (Articles 15 through 23 inclusive) is available at the following link on the website of the Italian Data Protection Authority:

- <https://www.garanteprivacy.it/regolamentoue>
or, alternatively, will be provided to you by the Data Controller upon your request.

Cuvio (VA), 01.06.2026