

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA – CUSTOMERS

Dear Customer,

this Privacy notice is provided pursuant to Article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation – hereinafter “GDPR”). The personal data you provide to us will be processed by Cofle S.p.A. (the “Data Controller”) in accordance with the GDPR and, in particular, in compliance with the principles of lawfulness, fairness, transparency, and protection of confidentiality and data subject rights.

1. Data Controller

The Data Controller is Cofle S.p.A., with registered office at: Via del Ghezzo, 54 – 20056 Trezzo sull’Adda (MI), Italy
VAT number: 05086630158 and Email contact: privacy@cofle.it

2. Data Protection Officer (DPO)

The Company has not appointed a Data Protection Officer (DPO), as the conditions set out in Article 37 GDPR do not apply.

3. Categories of Personal Data collected

Within the context of the relationship with the customer, the Data Controller processes personal data relating to natural persons, including company representatives. In particular, the following categories of personal data are processed:

- a) identification data (e.g. name, surname);
- b) contact details (e.g. email address, phone number);
- c) data relating to the company and the role held;
- d) data necessary for the management of the contractual, administrative and commercial relationship;
- e) data relating to customer service activities and complaint handling;
- f) any photographic images or technical documentation (e.g. photos of products, defects or installations) provided by the customer or collected in the context of assistance and complaint management activities.

4. Purposes of processing

Personal data will be processed for the following purposes:

- a) managing the contractual and commercial relationship with the customer;
- b) complying with legal, administrative, accounting and tax obligations;
- c) managing customer support, customer service and complaint handling activities;
- d) managing commercial relationships, including through agents and sales networks;
- e) protecting the rights of the Data Controller, including in judicial proceedings.

5. Nature of Data provision and legal basis

The provision of personal data is necessary for the performance of the contractual relationship and for compliance with legal obligations to which the Data Controller is subject. Failure to provide such data may prevent the establishment or performance of the contractual relationship. The processing of personal data is based on Article 6(1)(b) GDPR – performance of a contract or pre-contractual measures; Article 6(1)(c) GDPR – compliance with a legal obligation; Article 6(1)(f) GDPR – legitimate interest of the Data Controller in managing the commercial relationship and protecting its rights.

The Data Controller does not carry out automated decision-making processes, including profiling, pursuant to Article 22 GDPR.

6. Processing methods

Processing will be carried out using automated and/or manual means, with methods and tools ensuring compliance with the security measures referred to in Article 32 GDPR, by personnel duly authorised pursuant to Article 29 GDPR.

Appropriate technical and organisational measures are implemented to ensure the confidentiality and security of personal data and to prevent unauthorised access, disclosure, alteration or destruction.

7. Data Retention

In accordance with the principles of lawfulness, purpose limitation and data minimisation, personal data will be retained for the time necessary to manage the contractual relationship and, thereafter, for a period of up to 10 years, unless a longer retention period is required by law.

Data relating to customer service activities, complaints or legal disputes may be retained for a longer period where necessary to protect the rights of the Data Controller.

At the end of the retention period, personal data will be deleted or anonymised.

8. Recipients of Personal Data

Personal data will not be publicly disclosed. However, they may be shared with third parties, within the limits of the purposes described above, including:

- a) public authorities and competent bodies where required by law;
- b) consultants and professionals engaged by the Company (e.g. accountants, legal advisors);
- c) IT service providers, software providers and data hosting providers, including cloud services;
- d) banks and insurance companies;
- e) agents and the Company's sales network;
- f) companies belonging to the same corporate group, including those located in EU or non-EU countries, for production, logistics, commercial or support activities related to the contractual relationship;
- g) third parties involved in shipping, transport and delivery services.

Such recipients will process personal data either as Data Processors appointed pursuant to Article 28 GDPR or as independent Data Controllers, as applicable.

9. Transfer of Data Outside the EEA

The Data Controller does not systematically transfer personal data outside the European Economic Area (EEA). However, should such transfer be necessary, including within relationships with group companies or suppliers established outside the EEA, it will be carried out in compliance with Articles 44 et seq. GDPR, by adopting appropriate safeguards as required by applicable law.

10. Data Subject Rights

You may exercise your rights at any time under Articles 15–22 GDPR, including:

- a) the right to obtain confirmation as to whether or not personal data concerning you are being processed and access such data;
- b) the right to obtain information on the purposes of processing, categories of data, recipients and retention period;
- c) the right to rectification of inaccurate data or completion of incomplete data, as well as erasure or restriction of processing where applicable;
- d) the right to data portability;
- e) the right to object to processing;
- f) the right to lodge a complaint with the competent Supervisory Authority, namely the Italian Data Protection Authority (Garante per la protezione dei dati personali).

11. Additional Information

Additional information regarding the processing of personal data may be requested at any time from the Data Controller using the contact details provided above.