

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

### Relationship with customers

Pursuant to Articles 12 et seq. of the EU Regulation 2016/679 ("GDPR" or "Regulation"), and in general in compliance with the principle of transparency set out in the Regulation itself, the following information is provided regarding the processing of personal data (i.e. any information concerning an identified or identifiable natural person: "Data Subject") in connection with customer relations.

#### 1. DATA CONTROLLER

The Data Controller (i.e. the entity that determines the purposes and means of the processing of personal data) is **AL-KO Vehicle Technology Electronics S.r.l.**, with registered office in Via Vienna, 4 - 38121 Trento - Italy, tel. +39 0461 991 598, e-mail [cbe@cbe.it](mailto:cbe@cbe.it); [info@nordelettronica.it](mailto:info@nordelettronica.it) For contacts specifically related to the protection of personal data, including the exercise of the rights referred to in paragraph 8 below, we indicate in particular the e-mail address: [privacy@alko-tech.com](mailto:privacy@alko-tech.com) to which you are kindly requested to send any requests.

#### 2. PURPOSE OF

Personal data will be processed for the following purposes:

- a) negotiation, conclusion of contracts and fulfilment of the related obligations (to and for the benefit of the Controller): thus purposes strictly related to the management of the pre-contractual and contractual relationship with the customer, and consequent and related regulatory obligations, including administrative, accounting and tax formalities and fulfilments (e.g. acquisition of information prior to the conclusion of the contract; performance of activities on the basis of obligations derived from the concluded contract) and the protection of rights (**contractual purpose**).
- b) The data subject's data may be processed by the Controller for the purpose of promoting and selling the Controller's products and services by sending them to the e-mail address provided by the data subject (**e-mail marketing purposes**).

**3. TYPE OF DATA PROCESSED AND METHOD OF COLLECTION AND PARTIES AFFECTED** The data being processed belong to the category of common data, such as:

- surname, first name and date place of birth, residence;
- tax code and/or VAT number and other tax and related data such as the Cdl 'recipient code' for electronic invoicing;
- telephone number/email address/PEC address;
- supply data;

It should be noted that, in addition to the customer's data, data may be processed, again belonging to the category of common data, of persons traceable to them who have a relationship with the Controller, such as directors, employees and collaborators, with particular reference to their names and contact details, telephone number and e-mail address. This data is provided by the customer, the data subject or is recorded in public registers (such as CCIAA or registry office).

#### 4. COMPULSORY OR NON-COMPULSORY PROVISION AND LEGAL BASIS FOR

There is no obligation to provide data in the pre-contractual phase, but failure to provide the requested data may make it impossible to enter into the contract. The legal basis of the processing is the circumstance that it is necessary: for the performance of the contract to which the Data Subject is party or of the pre-contractual measures adopted at the request of the same; for the fulfilment of a legal obligation to which the Data Controller is subject. On the other hand, the protection of rights finds its legal basis in the relative legitimate interest of the Controller, just as falling within the scope of the Controller's legitimate interest, in this case in the performance of its business activity, are those data processing activities (e.g. entry in the management system or in the address book, analysis of turnover, internal checks on the quality of the service, etc.) which, while not constituting an obligation, are strictly connected to the performance of the contractual relationship.

For the purpose of marketing by e-mail, data processing is carried out on the basis of the Owner's legitimate interest in marketing activities through the use of the e-mail address. Pursuant to paragraph 4 of Art. 130 of Legislative Decree 196/2003 (Privacy Code) and subsequent amendments, the regulations provide for the possibility of sending, through the e-mail addresses you have provided, communications regarding products or services similar to those we have already provided you with, provided that you, adequately informed, do not refuse such use, either initially or on the occasion of subsequent communications.

## 5. PROCESSING AND STORAGE METHODS

The processing will be carried out:

- through the use of automated systems;
- by persons or categories of persons authorized to perform the relevant tasks;
- with the use of appropriate measures to guarantee the confidentiality of the data and prevent access to them by unauthorized third parties.

The data will be retained for the entire duration of the contractual relationship, and, after the termination of the relationship - limited to the data necessary at that point - for the extinction of the contractual obligations assumed and for the fulfilment of all possible fulfilments of law and for the protection requirements, including contractual ones, connected with or arising from it; ordinarily, therefore, the data will not be retained beyond 10 years after the termination of the contractual relationship.

There are no automated decision-making processes.

## 6. COMMUNICATION OF DATA

In addition to the subjects belonging to the corporate organizational structure of the Data Controller (e.g. employees and collaborators), authorized according to the relevance of their functions with the relevant processing, the data collected and processed may be communicated, exclusively for the purposes specified above, to

- all persons to whom the right of access to such data is recognized by virtue of regulatory provisions;
- employees, collaborators, suppliers of the Data Controller, within the scope of their duties and/or contractual obligations relating to the execution of the relationship with the Data Subjects; the Data Controller's suppliers include, by way of example, banking and credit institutions, insurance companies, legal advisors; software suppliers and related assistance;
- tax authorities and other entities for which mandatory reporting is required.

An up-to-date list of the persons designated as Data Processors pursuant to Article 28 GDPR can be obtained from the contact details of the data controller listed above.

The owner undertakes to only communicate to the above-mentioned parties the data necessary to be able to fulfil the relevant tasks and/or obligations, preferring where possible to anonymize the data.

The data are not subject to dissemination.

## 7. PLACE OF DATA PROCESSING

Personal data is processed on the territory of the European Union. The data of the person concerned will not be transferred to third countries or international organizations outside the EU.

## 8. RIGHTS OF THE DATA SUBJECT

The GDPR grants the Data Subject the exercise of the following **rights** with regard to personal data concerning him/her (the summary description is indicative, for the full enunciation of the rights, including their limitations, please refer to the Regulation, and in particular Articles 15-22):

- access** to personal data (the data subject has the right to obtain, free of charge, information about the personal data concerning him/her held by the Controller and the processing thereof, as well as to obtain a copy of such data in accessible format);
- correction of personal data (upon notification by the data subject, correction or supplementation of personal data -not the expression of evaluative elements- that are incorrect or inaccurate, even if they have become such due to being out of date);
- deletion** of personal data (right to be forgotten) (e.g. the data are no longer necessary in relation to the purposes for which they were collected or processed; they have been processed unlawfully; they must be deleted in order to comply with a legal obligation; the data subject objects to the processing, provided the conditions are met);
- limitation of processing** (in certain cases -contesting the accuracy of the data, during the time necessary for verification; contesting the lawfulness of processing with opposition to deletion; need for use for the data subject's rights of defense, while they are no longer useful for processing purposes; if there is an objection to the processing, while the necessary verifications are carried out - the data will be retained in such a way as to be eventually restored, but, in the meantime, they cannot be consulted by the Data Controller except in connection with the verification of the validity of the request for restriction made by the Data Subject, or with the Data Subject's consent, or for the establishment, exercise or defense of legal claims in court or to protect the rights of another natural or legal person or for reasons of substantial public interest of the Union or of a Member State);
- **objection** in whole or in part, on grounds relating to the particular situation of the data subject, to processing carried out on the basis of legitimate interest;
- portability of data** (where the processing is based on consent or on a contract and is carried out by automated means, the Data Subject shall, at his or her request, be provided with the personal data concerning him or her in a structured, commonly used and machine-readable format and may transmit them to another Data Controller, without hindrance from the Data Controller to whom he or she has provided them and, if technically feasible, may have such transmission carried out directly by the latter).

The Data Subject also has the right to lodge **a complaint with the *Garante per la Protezione dei dati personali*** if he/she believes that the processing that concerns him/her violates the provisions of the law on the protection of personal data; the **Garante per la protezione dei dati personali** can be contacted via the contact details indicated on the Authority's website "[www.garanteprivacy.it](http://www.garanteprivacy.it)". In any case, we would like to have the opportunity to address in advance any doubts of the Data Subjects, who may contact the e-mail address [privacy@alko-tech.com](mailto:privacy@alko-tech.com) or the other contact details of the Data Controller indicated above for any clarification concerning the processing of their personal data and for the exercise of their rights.