

Hafliger Films SpA, with registered office at Via B. Buozzi no. 14 - 20089 Rozzano (MI), has for many years considered it of fundamental importance to protect the personal details of customers and suppliers, and has ensured that any processing of personal data, by manual or electronic means, is done in total observance of the safeguards and rights established under EU Regulation 2016/679 (hereinafter also '**GDPR**') concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data, and other applicable regulations concerning the protection of personal data.

The term 'personal data' refers to the definition that appears in article 4(1) of the **GDPR**, i.e. '*any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person*' (hereinafter also '**Personal Data**').

Your Personal Data consists of:

- First name and surname;
- Postal address;
- VAT number or tax code;
- Telephone or mobile number;
- The organisation you belong to (e.g. your employer);
- Email address.

Before proceeding with any processing of **Personal Data** (as defined in article 4(2): '*any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction*') (hereinafter also '**Processing**'), the **GDPR** requires the persons to whom the **Personal Data** relates (hereinafter also the '**Data Subjects**') to be informed of the reasons for which the data is required and how it will be used.

The purpose of this document is therefore to provide all the information you need, in a simple, straightforward manner, to enable you to provide your **Personal Data** in full awareness of what this entails, and to request clarification and/or amendment of your data if necessary.

1. Who will process your Personal Data?

The company that will process your **Personal Data** for the purposes indicated under items 2 and 3 below, and which therefore assumes the role of data controller, is **Hafliger Films SpA**, with registered office at Via B. Buozzi no. 14 - 20089 Rozzano (MI), Italy - info@hafliger.it (hereinafter also the "**Controller**").

2. For what main purposes will your personal data be processed?

The **Controller** needs to collect certain **Personal Data** relating to you for the following purposes:

- a) To respond to requests for information and trade requests that you issue voluntarily, including requests sent via the contact form at <http://www.hafliger.it/en/contatti.php>;
- b) To fulfil contractual and legal obligations (accounting and tax obligations in particular) where a contract is concluded with the **Data Subject**.

Your **Personal Data** will also be **Processed** by the **Controller** for the purpose of providing assistance and advice to you as a customer by telephone, in response to contracts and requests for quotes received via the website <http://www.hafliger.it> (the **Website**), by telephone on +39 028251122/3, or by fax on +39 0289200449.

You are asked to provide your data for the above purposes so that we can provide the services that appear on the **Website**: processing requests for information or quotes and any intervention requested of the **Controller** via any of the communication tools. Any refusal to provide your details will therefore make it impossible for you to avail yourself of these services.

3. Other purposes

Subject to your express consent, the **Controller** has free and unequivocal entitlement under article 6(1), point a) of the **GDPR** to use your **Personal Data** for the following additional purposes:

- c) to check the level of customer satisfaction relating to services provided by the **Controller**;
- d) to ascertain the effectiveness and suitability of services offered via the **Website**;
- e) to forward communications (including those of a commercial nature) for the purpose of updating you on the **Controller's** news and activities.

Any **Processing** of your **Personal Data** for the purposes indicated in points c), d) and e) is elective and dependent on obtaining your consent, which must be conferred in observance of the provisions of article 7 of the **GDPR** to demonstrate that your **Personal Data** is **processed** lawfully.

The means of communication used for the activities indicated in points c), d) and e) may be automated (email) or conventional (telephone calls from an operator, terrestrial mail). In any event, you may withdraw your consent in full or in part at any time, by specifying, for example, that contact should be made by conventional means only. This will explained more fully in item 7.

4. To which persons may your Personal Data be disclosed?

Your **Personal Data** may be disclosed to specific persons considered as recipients of such **Personal Data**. For details please refer to article 4(9) of the **GDPR**, which defines a recipient of **Personal Data** as '*a natural or legal person, public authority, agency or another body, to which the personal data is disclosed, whether a third party or not*' ('**Recipients**' are also defined below).

In this perspective and in order to correctly execute all the required **Processing** activities for the purposes indicated in this information sheet, the following **Recipients** may be involved in processing your **Personal Data**:

- individuals, employees and/or partners of the **Controller** assigned to specific and other tasks requiring **Processing** of your **Personal Data**; these individuals have received specific instructions on using **Personal Data** securely and correctly (hereinafter also '**Authorised Persons**');
- where required by law or to prevent or inhibit the commission of crime, your **Personal Data** may be disclosed to public bodies or judicial authorities.

5. For how long will your Personal Data be processed?

Your **Personal Data** will be processed by the **Controller** for a period no longer than is required to fulfil the purposes for which it was collected and subsequently processed.

In any event, you may notify us via any means indicated in this information sheet if you wish to withdraw your consent for one or more of the purposes for which it was requested. Any withdrawal of consent will require the **Controller** to cease any **Processing** of your **Personal Data** for such purposes.

6. Can consent be withdrawn once given, and how?

In accordance with the **GDPR**, where you have given consent for your **Personal Data** to be **Processed** for one or more of the purposes for which it was requested, you may withdraw your consent at any time, in full or in part, without prejudice to the legality of your data being **Processed** in accordance with the consent given before withdrawal.

The ways of revoking consent are very simple and straightforward: by contacting the **Controller** via any of the means indicated under item 7 of this information sheet.

7. What are your rights?

In accordance with article 15 of the **GDPR**, you may access your **Personal Data**, ask for it to be erased if it has been collected in violation of any law or regulation, and object to the **Processing** of it for specific, legitimate reasons.

Specifically, you are entitled to exercise the following rights at any time in respect of the **Controller**:

- **Right of Access**: in accordance with article 15(1) of the **GDPR**, you have the right to obtain confirmation from the **Controller** as to whether any of your **Personal Data** is **Processed**, and if so to be given access this **Personal Data** and the following information: **a)** the purposes for which it is

Processed; **b)** the categories of **Personal Data** in question; **c)** the **Recipients** or categories of **Recipient** to whom your **Personal Data** has been or will be disclosed, especially if these **Recipients** are located in third-party countries or at international organisations; **d)** where possible, the period for which the **Personal Data** you provided is kept, or where this is not possible, the criteria used to determine this period; **e)** the existence of the right of the **Data Subject** to ask the **Controller** to correct or erase any **Personal Data** or restrict the **Processing** of any **Personal Data** concerning him/her or object to the **Processing** of it; **f)** the right to submit a complaint to a supervisory authority; **g)** where the **Personal Data** has not been collected from the **Data Subject**, all information available on its origin; **h)** the existence of any automatic decision-making process, including profiling as referred to in article 22(1 and 4) of the **GDPR** and relevant information on the logic used, at least in such cases, and the relevance of such data and the consequences its **Processing** for the **Data Subject**. All this information can be found in this information sheet, which will remain accessible indefinitely under the Privacy section of the **Website**.

- **Right of rectification:** in accordance with article 16 of the **GDPR**, you have the right to have any **Personal Data** rectified if it is incorrect. In addition, regarding the purposes of the **Processing**, you may have your **Personal Data** amended if it is incomplete, by providing a supplementary statement.
- **Right to erasure:** in accordance with article 17(1) of the **GDPR**, you have the right to have your **Personal Data** erased without undue delay, and the **Controller** has the obligation to erase your **Personal Data** for any of the following reasons: **a)** the **Personal Data** is no longer needed in relation to the purposes for which it was collected or otherwise processed; **b)** you have decided to withdraw the consent on which the **Processing** of your **Personal Data** is based and there is no other legal ground for its **Processing**; **c)** you object to the **Processing** in accordance with article 21(1 or 2) of the **GDPR** and there are no overriding legitimate grounds for the **Processing** of your **Personal Data**; **d)** your **Personal Data** has been processed unlawfully; **e)** you need to delete your **Personal Data** in order to comply with a legal obligation in the EU or a Member State. In accordance with article 17(3) of the **GDPR**, the **Controller** is entitled in certain cases to refuse to erase your **Personal Data** where **Processing** of it is needed, for example, to exercise the right to freedom of expression and information, for the fulfilment of a legal obligation, for reasons of public interest, for the purposes of archiving in the public interest, for scientific, historical research or statistical purposes, for inspection, or for the exercise or defence of legal claims.
- **Right to restriction of processing:** in accordance with article 18 of the **GDPR**, you may restrict the **Processing** of your **Personal Data** where one of the following applies: **a)** you have contested the accuracy of your **Personal Data** (the restriction will continue for the period necessary for the **Controller** to verify the accuracy of the **Personal Data**); **b)** the **Processing** is unlawful but you object to the erasure of your **Personal Data** and request that it be restricted instead; **c)** although the

Controller no longer needs it for the purposes of **Processing**, your **Personal Data** is required for the establishment, exercise or defence of a legal claim; **d)** you object to the **Processing** in accordance with article 21(1) of the **GDPR** pending verification of whether the **Controller's** legitimate grounds override your own. Where the **Processing** has been restricted and with the exception of processing for storage purposes, your **Personal Data** will only be processed with your consent or to confirm, execute or defend a legal claim or to safeguard the rights of another natural or legal person, or for significant public interest reasons. In any event, we shall inform you in advance of any restriction being removed.

- **Right to portability of data:** in accordance with article 20(1) of the **GDPR**, you may request and receive all your Personal Data from the Controller at any time in a structured, commonly-used and readable format, or ask for it to be transmitted to another data controller without hindrance. In this event, it is your responsibility to provide us with the precise details of the new data controller to whom you wish your **Personal Data** to be transferred, by supplying written authorisation.
- **Right to object:** in accordance with article 21(2) of the **GDPR**, as reiterated by Recital 70, you may object to the **Processing** of your **Personal Data** at any time if it is processed for direct marketing purposes, including any profiling related to such direct marketing.
- **Right to submit a complaint to the supervisory authorities:** without prejudice to your right to claim any administrative or judicial review, if you consider that the **Processing** of your **Personal Data** has been executed by the **Controller** in violation of the **GDPR** and/or applicable law, you have the right to complain to the appropriate Personal Data Protection Authority.

To exercise any of the above rights, simply contact the Controller by any of the following means:

- by registered letter to Hafliger Films SpA, registered office: Via B. Buozzi no. 14 - 20089 ROZZANO (MI);
- by fax: +39 02 89200449;
- by email : info@hafliger.it.

8. the cookies?

The cookies we use are technical and temporary cookies; they are only used for site monitoring. For more detail read the document on cookies.

(http://www.hafliger.it/pdf/Privacy_Cookie_EN.pdf).

9. Where will your Personal Data be processed?

Your **Personal Data** will be processed by the **Controller** within the confines of the European Union.

If for technical and/or operational reasons it is necessary to employ persons located outside the European Union, we hereby inform you that these persons will be appointed as **Processors** in accordance with and

for the purposes of article 28 of the **GDPR**, and the transfer of your **Personal Data** to these persons, restricted to the execution of specific **Processing**, will be governed by the provisions of Section 5 of the **GDPR**; in particular, all necessary precautions will be taken to guarantee the most complete protection of your **Personal Data**, basing the transfer on:

- a) adequacy decisions expressed by the European Commission regarding the third-party country recipients;
- b) appropriate guarantees expressed by the third party recipient in accordance with article 46 of the **GDPR**.

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