

NOTE: This document takes into account the recommendations provided for by the Group of European Supervisory Authorities , Working Party Article 29 (“**WP29**”), in the draft of the recent “*Guidelines on transparency under Regulation 2016/679 (WP260)*”

It is hereby understood that this document is subject to amendments and supplements as a result of the publication of the final Guidelines, as well as of any changes to the Privacy Code as provided for by the Italian legislative decrees necessary for the adjustment to the GDPR to be issued by the Italian Government by 21 May 2018 (pursuant to Italian Law no. 163/2017, *Law of European Delegation 2016-2017 (Delegation to the Government for the transposition of European directives and the implementation of other European Union acts)*), as well as additional Guidelines or WP29 Opinions or provisions of the Italian Supervisory Authority.

CONTACTS NOTICE

1. INTRODUCTION

- 1 Pursuant to Art. 13 of Italian Legislative Decree no. 196 of 30 June 2003, known as “Personal data protection code” (hereinafter “**Code**”), we hereby inform you that your personal data (hereinafter “**Data**”) shall be processed by Sirap Gema S.p.A. (hereinafter “**Sirap**” or “**Company**”) to reply to requests of information on the Company.
- 2 This notice (hereinafter “**Notice**”) also contains the information required pursuant to Art. 13 of the European Regulation no. 2016/679 concerning the protection of individuals with regard to personal data processing (hereinafter “**GDPR**”), which came into force on 24 May 2016 and is applicable as from 25 May 2018.

2. PURPOSE OF THE PROCESSING AND LEGAL BASIS

- 2 The Data provided by you when completing the form shall be processed by the Company to reply to your requests for information.

The processing is therefore necessary to fulfil your request. The legal basis for this processing is therefore the performance of a contract which the Data Subject is a party of.

Pursuant to Art. 13, para. 1, letter b) and c) of the Code and Art. 13, para. 2, letter e) of GDPR, we hereby inform you that the provision of Data marked with an asterisk in the data collection form is mandatory for the pursuit of the aforementioned purpose; therefore, any failure to provide such data shall not allow the Company to provide the requested information.

- 2 Subject to your specific consent and until revocation thereof, the Data may be processed by the Company for commercial and/or promotional purposes, that is, by way of example, to send - with automated (such as SMS, MMS and e-mail) and traditional methods of contact (such as telephone calls and traditional mail) - promotional and commercial communications relating to the services/products offered by the Company, as well as the carrying out of market studies and statistical analysis.

In this case, the legal basis for this processing is therefore the consent.

It is hereby understood that consent to the processing of Data for the aforementioned purpose is purely optional; therefore, in the case of refusal of processing, the Data shall be processed for the sole purpose indicated in paragraph 2.1 of this notice.

3. METHOD OF PROCESSING

The processing is based on principles of correctness, lawfulness, transparency and data minimization (*privacy by design*); data may be processed either manually or through

automated procedures designed to store, process and transmit them and through appropriate technical and organizational measures, taking into account the state of the art and implementation costs, so as to guarantee, inter alia, the security, confidentiality, integrity, availability and resilience of systems and services and to avoid any risk of loss, destruction, unauthorized access or disclosure or, in any case, illicit use, as well as through reasonable measures to promptly cancel or correct inaccurate data with respect to the purposes for which they are processed.

4. DATA CONSERVATION PERIOD

- 4 The Data collected for the purposes indicated under section 2.1 shall be retained for 30 days to reply to individual requests for information. Once the aforementioned term has elapsed or, in any case, when requests have been fulfilled, your Data shall be destroyed or made anonymous.
- 2 The Data collected for the purposes indicated under section 2.2 shall be retained until withdrawal of your consent. That being the case, data shall be then destroyed or made anonymous.

5. PERSONAL DATA PROTECTION MODEL

- 5 The Company, as Data Controller, has prepared a model for the personal data protection and established roles and responsibilities as to data protection by identifying, in particular, the persons in charge each corporate organizational unit as those responsible for the performance of the model, limited to the processing which they are responsible for, in compliance with the applicable regulatory requirements ("Privacy Contact Persons").
- 2 Your Data may only be processed by the employees of the company functions authorized for the processing as they are responsible for the pursuit of the aforementioned purposes. These employees have been appointed as Persons in charge of the processing and have received adequate operating instructions in this regard.

6. CATEGORIES OF RECIPIENTS

- 6 The Data may be disclosed to persons acting as Data Controllers or processed, on behalf of the Company, by persons appointed as Data Processors, who are given appropriate operating instructions. These persons are essentially included in the following categories:
 - a. companies performing the management and/or maintenance of the Website (Huovo S.r.l.);
 - b. supervisory and control authorities and any public entity entitled to request the Data;

The complete and updated list of the Data Processors is available upon request by sending a communication to the address below or an email to morethanpackaging@sirapgroup.com.

7. DATA SUBJECT'S RIGHTS

- 7 Pursuant to the current Privacy Code, Data Subjects have the right to access the data concerning them at any time and to exercise the other rights provided for by Art. 7, including requesting the updating, rectification or supplement of inaccurate or incomplete data, the cancellation or blocking of those processed in violation of the law, and to object the processing of any data concerning them.
- 2 Pursuant to the GDPR and as from its date of application, Data Subjects are granted the rights referred to in Articles 15 to 22 of the GDPR, where applicable.

In particular, Data Subjects may ask the Data Controller to access or delete Data, correct inaccurate Data, supplement incomplete Data and limit processing in the cases provided for by Art. 18 of the GDPR¹.

If the conditions for exercising the right to portability pursuant to Art. 20 of the GDPR ² are fulfilled, the Data Subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another Data Controller without hindrance, where technically feasible.

Data Subjects have the right to withdraw the consent given at any time for the purposes referred to in section 2.2 above.

Data Subjects have the right to lodge a complaint with the competent Supervisory Authority (in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement).

The aforementioned rights may be exercised by sending a communication by ordinary mail to Sirap Gema

S.p.A. at via Industriale n. 1/3, 25028 Verolanuova (BS), Italy, to the kind attention of the Data Controller or by e-mail to morethanpackaging@sirapgroup.com

8. DATA CONTROLLER IDENTITY AND CONTACT DATA

The Data Controller is Sirap Gema S.p.A., in the person of its legal representative *pro tem*, with registered office at Via Industriale n. 1/3, 25028 Verolanuova (BS), Italy, e-mail address morethanpackaging@sirapgroup.com, phone + 39 030 93681.

¹ Namely if:

the accuracy of the personal data is contested by the Data Subject, for a period enabling the Data Controller to verify the accuracy of the personal data;

the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;

although the Data Controller no longer needs it for processing purposes, personal data are necessary for the Data Subject to ascertain, exercise or defend a right in court;

- a) the Data Subject objected to the processing pursuant to Article 21, para. 1, pending verification of the possible prevalence of the legitimate reasons of the Data Controller over those of the Data Subject.

² And namely if the processing is based on consent pursuant to Art. 6.1 letter a) or Art. 9.2, letter a) or on the contract pursuant to Art. 6.1, letter b) of the GDPR and is carried out with automated tools.