

CONTACT US INFORMATION STATEMENT

1. INTRODUCTION

Pursuant to Article 13 of European Regulation 2016/679, concerning the protection of individuals with regard to the processing of personal data (hereinafter "GDPR"), **Sirap Gema S.p.A.**, with registered office in Verolanuova (BS), 25028 Via Industriale 1/3, (hereinafter the "Company" or "Sirap" or "Data Controller") henceforth provides certain information relating to the processing of your personal data when you fill out the "Contact us" form.

2. DATA CONTROLLER AND DATA PROTECTION OFFICER (DPO)

The data controller is Sirap Gema S.p.A. in the person of its pro tempore legal representative, with registered office in Verolanuova (BS), zip code 25028, at via Industriale, 1/3, telephone 03093681

The Data Protection Officer (DPO) can be reached at the e-mail address dpo@sirapgroup.com

3. PURPOSE AND LEGAL BASIS OF PROCESSING

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

Therefore, the processing is necessary to fulfil your request. The legal basis justifying the processing is therefore the performance of a contract to which you are party.

4. PROVIDING THE DATA AND CONSEQUENCES IN CASE OF REFUSAL

- 4.1. Pursuant to art. 13, paragraph 2, (e) of the GDPR, we 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, failure to provide such data will prevent the Company from providing you with the information requested.

5. PROCESSING METHODS

The processing of Data is based on the principles of correctness, lawfulness, transparency and minimization of data (*privacy by design*); it can be carried out either manually or using automated methods designed to memorize, process and transmit them and will take place through adequate technical and organizational measures, taking into account the state of the art and the costs of implementation, to ensure, among other things, the security, confidentiality, integrity, availability and resilience of systems and services, preventing the risk of unauthorized loss, destruction, access or disclosure or, in any case, any unlawful use, as well as through reasonable measures to promptly cancel or correct any inaccurate data with respect to the purposes for which they are processed.

6. DATA RETENTION PERIOD

- 6.1. The Data collected for the purpose specified in point 3.1 will be kept for 30 days to reply to individual requests for information. Once the aforementioned deadline has expired or the requests have otherwise been fulfilled, your data will be destroyed or made anonymous.

7. PERSONAL DATA PROTECTION FRAMEWORK

- 7.1. The Company, as Data Controller, has defined a framework for the protection of personal data, identifying roles and responsibilities with respect to data protection, and specifically identifying the heads of corporate organizational units as persons in charge for implementing the framework, limited to the processing under their remit, in compliance with applicable regulatory provisions ("Privacy Representatives").
- 7.2. The Data may only be processed by employees of company departments which have been authorized to process data for the pursuit of the aforementioned purposes. These employees have been appointed as persons authorized to the processing and have received appropriate operating instructions in this regard.
- 7.3. The Data Controller has designated a **DPO**, who can be contacted at the e-mail address dpo@sirapgroup.com.

8. CATEGORIES OF RECIPIENTS

- 8.1 The data may be disclosed to external parties acting as independent data Controllers such as, for example, authorities and supervisory and control bodies.
- 8.2 Pursuant to art. 28 of the GDPR, the Data Controller has also appointed third-party companies that process Personal Data on its behalf as external data processors giving them adequate operating instructions (hereinafter collectively referred to as "Data Processors" or "Processors"). These parties are essentially included in the following categories:
 - companies that perform management services and technical maintenance of the website;
 - companies that carry out statistical analysis and / or market research;
- 8.3 Your personal data will not be disclosed to third parties nor will they be disseminated.

9. TRANSFER OF DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION

- 9.1. Your personal data will not be transferred outside the European Union.

10. RIGHTS OF THE DATA SUBJECT

- 10.1. In relation to the processing of personal data carried out by the Data Controller, you can request the Data Controller to access your personal data, the cancellation of your data, the correction of inaccurate data, the completion of incomplete data, the limitation of processing in the cases provided for by art. 18 GDPR, and you may object to the processing where the owner has a legitimate interest.
- 10.2. Where the processing is based on consent or the contract and is carried out with automated tools, you have the right to receive your data in a structured format, commonly used and readable by an automatic device, as well as, if technically feasible, to transmit them to another controller without impediment.
- 10.3. Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the relevant regulatory Authority in the Member State in which you habitually reside or in the State in which the alleged violation occurred.
- 10.4. To exercise your rights you may contact the Data Controller by sending a written notice to the address specified above or an e-mail to morethanpackaging@sirapgroup.com.

Last updated: May 2019