



#### HOLDER OF DATA PROCESSING

<b>COMPANY</b>	ICA S.R.L.
<b>VAT NUMBER.</b>	01109220044
<b>LEGAL REPRESENTATIVE</b>	Bonetto Mattia Francesco
<b>LEGAL HEADQUARTERS</b>	Via Monviso n.31, 12040 Corneliano d'Alba (CN)

#### PRIVACY POLICY

In accordance with the provisions of EU Regulation no. 679/2016 (hereinafter the "Regulation"), Article 13 - Information to be provided if personal data are collected from the person concerned,

#### **ICA S.r.l.,**

(Hereinafter the "Company"), provides the following information on the processing of personal data of its customers and suppliers (hereinafter the "Data") carried out by the Company, in its capacity as Data Controller.

#### **Identity of the Data Controller and methods of contact**

Pursuant to Article 4 of the Regulation, the Company is the owner of the processing of data relating to its customers and suppliers.

For communications or requests, the Company can be reached by e-mail at the address:

<b>E-MAIL</b>	<a href="mailto:info@ica-tissue.it">info@ica-tissue.it</a>
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#### **Categories and types of Data collected and processed**

The Data processed by the Company include personal data, not belonging to particular categories (art. 9 of the Regulation) collected for the purpose of concluding the contract and in the context of the execution and / or stipulation of the same.

It is also possible that personal data of third parties communicated by customers and suppliers may be processed. With respect to this hypothesis, customers and suppliers act as independent data controllers and assume the consequent legal obligations and responsibilities, relieving the Company of any dispute, claim and/or request for compensation for damage caused by processing that may reach the Company from third parties.

Specifically, the following information is collected:

- Information provided during the definition of the contract, including contact information, personal data, information on activities and services, information on payment methods.

### **Purpose and legal basis of the treatment and nature of the provision of data**

In compliance with current legislation on the protection of personal data, the Data will be stored, collected and processed by the Company for the following purposes:

- a) fulfilment of contractual obligations, execution and/or stipulation of the contract and/or management of any pre-contractual measures;
- b) fulfilment of any regulatory obligations, tax and fiscal provisions arising from the performance of business activities and obligations related to administrative and accounting activities;
- c) sending, directly or through third party providers of marketing and communication services, newsletters and communications for direct marketing purposes through email, SMS, MMS, push notifications, fax, paper mail, telephone with operator;
- d) communication of the Data to third party companies for the sending of newsletters and communications for marketing purposes through email, sms, mms, push notifications, fax, paper mail, telephone with operator.

The legal bases of the processing for the purposes a) and b) above are Articles. 6.1.b) and 6.1.c) of the Regulation.

The provision of data for the above purposes is optional, but failure to provide the data and refusal to provide them would make it impossible for the Company to perform and / or enter into the contract and provide the services requested by the same.

The legal basis for the processing of personal data for the purposes c) and d) is art. 6.1.a) of the Regulation as the processing is based on consent, it should be noted that the Owner may collect a single consent for the marketing purposes described herein, pursuant to the General Provision of the Guarantor for the protection of personal data "Guidelines on promotional activities and combating spam" of July 4, 2013. Consent to the use of data for marketing purposes is optional and if the interested party wishes to oppose the processing of data for marketing purposes carried out with the means indicated herein, as well as revoke the consent given; he may at any time do so without any consequence (except for the fact that he will no longer receive marketing communications) by following the instructions in the section "Rights of the interested party" of this Policy.

### **Methods of data processing**

In relation to the purposes indicated above, the Data is processed by manual, computer and telematics means with logic strictly related to the purposes and, in any case, in such a way as to ensure the security and confidentiality of the Data, in addition to compliance with specific obligations under the law. The Data will be processed in accordance with the principle of lawfulness, correctness, relevance and not excessive, in

accordance with the provisions of the legislation on the protection of personal data. The processing will be carried out by formally appointed and adequately trained personnel.

### **Scope of communication and dissemination of Data, recipients and transfer of Data and data controllers**

For the above purposes, the Data may be communicated to third parties appointed as data processors pursuant to Article 28 of the Regulation and in particular to banks, companies active in the insurance field, service providers strictly necessary for the performance of business activities, or to consultants of the company, where this is necessary for tax, administrative, contractual or for needs protected by current legislation.

Finally, the Data may be shared with authorities, bodies and/or subjects to whom the Data must be communicated by virtue of legal provisions or orders from authorities. These authorities, bodies and / or individuals will operate as independent data controllers.

The Data will not be disclosed.

The periodically updated and complete list of the persons appointed to process the Data may be requested by sending an e-mail to the Data Controller at the addresses indicated above.

### **Data transfer to international organisations and/or non-EEA countries (European Economic Area)**

Any transfer of Data to international organizations and/or countries outside the EEA, will be done in one of the ways permitted by applicable law, such as the consent of the person concerned, the adoption of Standard Clauses approved by the European Commission, the selection of subjects participating in international programs for the free movement of data (eg EU-USA Privacy Shield) or operating in countries considered safe by the European Commission.

Upon request, it is possible to obtain more information from the Company at the above contacts.

### **Data Retention**

We will retain your information as long as you are an active customer and supplier of the Company. Once the relationship has ended, the data will be stored on paper and/or computer for the time necessary for the purposes for which it was collected, in accordance with the principles of limitation of storage and minimization set forth in Article 5, paragraph 1, letters c) and e) of the Regulations.

The Data will be stored in order to comply with regulatory obligations and pursue the aforementioned purposes, in accordance with the principles of indispensability, non excess and pertinence.

We will retain information to comply with the law, prevent fraud, resolve disputes, resolve problems, enforce our agreements and take other actions permitted by law, after which, no longer the aforementioned reasons for processing, the Data will be deleted, destroyed or simply stored anonymously.

Upon request, you can obtain more information from the Company at the above contacts.

## Rights of the interested party

In relation to the aforementioned processing, each Interested Party may exercise the rights referred to in Articles 15 to 22 of the Regulations.

In particular, the Interested Party has the right to ask the Company for access to its Data, the rectification or cancellation of the same, has the right to oppose the processing or to request the limitation of the processing in the cases provided for in Article 18 of the Regulation and to obtain in a structured format, commonly used and readable by automatic device, its Data, in the cases provided for in Article 20 of the Regulation.

The interested party may also revoke at any time the consents given pursuant to Article 7 of the Regulation, as well as lodge a complaint with the Guarantor Authority for the protection of personal data pursuant to Article 77 of the Regulation, if he believes that the processing of his Data is contrary to the legislation in force. (For Italy: Guarantor for the protection of personal data [www.garanteprivacy.it](http://www.garanteprivacy.it)).

To exercise these rights, write to the Company, to the following reference:

<b>COMPANY</b>	ICA S.R.L.
<b>LEGAL HEADQUARTERS</b>	Via Monviso n.31, 12040 Corneliano d'Alba (CN)

or by sending an e-mail to the following e-mail address:

<b>E-MAIL</b>	info@ica-tissue.it
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In cases of opposition to the processing of Data pursuant to Article 21 of the Regulation, the Company reserves the right to evaluate the request, which will not be accepted if there are legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the person concerned. Requests must be addressed in writing to the Company at the addresses indicated above.