

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Pursuant to Article 13 of Regulation (EU) 2016/679 (the "GDPR")

This page describes the characteristics of the processing of personal data of the users (the "Users") of simulator.enoplastic.com (the "Website").

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The information on this page does not apply to third-party Websites, *apps* and content of any kind, even if they are accessible from the Website by clicking on *links* therein.

In such cases, the data protection provisions provided by such third parties may be applicable, which may differ from these and which we advise you to consult before disclosing any data.

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1. Data controller and contact details

For the purposes of this information notice, the data controller is **Enoflex S.p.A.**, with registered office in Bodio Lomnago (VA), via Luigi Galvani 1, VAT no. and tax no. 13400560150 (hereinafter simply "Enoflex", the "Company" or the "Data Controller").

The Data Protection Officer (DPO) appointed by Enoflex is LCA SERVIZI S.r.l. and it can be reached at the following address: Via della Moscova 18, 20121, Milan, e-mail: dpo@lcalex.it.

If you have any doubts about how the Controller processes your personal data, you can always contact the Data Controller:

- by post, to the address via Luigi Galvani 1, 21020 Bodio Lomnago (VA), for the attention of the Human Resources Manager; or
- to the e-mail address privacy@enoplastic.com

2. Methods of data collection and types of data processed

Data transmitted voluntarily by Users

Within the Website there are some data collection *forms* to proceed to the simulation of the ecological impact of some products related to the *green* line of Enoflex or voluntary subscription to the *newsletter* service. In these cases the data requested from the user are:

- common, identifying data, such as name and surname, or company name;
- common contact data, such as e-mail address.

Cookies

No cookies are used on the website

The various types of personal data listed above are jointly referred to in the following as "Data".

3. Purpose and legal basis of processing

The Data will be processed exclusively for the purpose of:

- a) to carry out the various requests made by the users themselves and, in particular, to provide the calculation of the ecological impact on the selected product and send the relative report containing the saving of CO2 and plastic kg to the e-mail address indicated. The legal basis for this processing is the **legitimate interest** of the Data Controller in pursuing its *business* activities to follow up on the users' requests.
This legitimate interest has been duly balanced against the reasonable expectations of the data subjects and, as it does not affect the rights of the natural persons involved, since the processing of the Data is carried out following the user's own request and does not involve the processing of special categories of personal data referred to in Article 9 of the GDPR, it has been deemed to prevail.

The provision of the aforementioned Data by the user, although optional, is necessary in order to execute the requests received and, therefore, failure to provide it would make it impossible for us to take charge of the requests received and follow them up.

- b) to send you by e-mail, upon your explicit consent, the *newsletter* of Enoflex, containing news and updates on new products or services of the Data Controller. This processing has its legal basis in the **consent** of the person concerned.

The provision of Data for such purposes is based on your explicit and prior consent: any refusal, or subsequent opposition, will make it impossible for the Data Controller to send you communications and updates on its activities. You may revoke your consent at any time by following the procedure indicated in each e-mail or by sending a specific request to be transmitted to the addresses indicated in the following article 8. Any withdrawal of consent shall not affect the lawfulness of the processing based on the consent given before the withdrawal.

- c) exercise the rights of the Controller, such as the right to defence in court, on the basis of the **legitimate interest** of the Controller. This legitimate interest is to be considered prevailing since it corresponds to a constitutionally guaranteed right and, as such, is socially recognised as prevailing over the interests of the individual concerned.

The provision of Data for this purpose is necessary to enable the Controller to defend itself in legal proceedings.

4. Data recipients

The Data will be communicated and may be known *(i)* by employees and collaborators of the Company, duly instructed and designated to the processing; *(ii)* by third parties who provide accessory or instrumental services to the activities of the Company, in relation, for example, to the development, provision and operational maintenance of the Website; and *(iii)* external subjects operating as autonomous holders such as, by way of example, Authorities and supervisory and control bodies and, in general, to subjects, including private subjects, entitled to request the data (such as, for example, accounting consultants, legal consultants), Public Authorities who make an express request for administrative or institutional purposes, in accordance with the provisions of current national and European legislation.

5. Place of processing and transfer of Data

The processing of the User's Data shall take place at the aforementioned premises of the Company, and the Data shall be stored on *servers* located within the European Union.

6. Processing methods, security measures and data retention period

The Data will be processed both in paper form and by electronic, computerised or automated means, using systems that ensure their protection, security and confidentiality.

The Company has also adopted specific and adequate logical, legal, organisational and technical security measures to prevent the loss of Data, unlawful or unauthorised use thereof and unauthorised access thereto.

Data collected and processed for:

- a) the calculation of the ecological impact of the product selected, by filling in the *form on the Website*, will be stored for the time necessary to process the user's requests and send a copy of the report to the email address indicated, after which it will be deleted;
- b) your subscription to the *newsletter* service, on the basis of your optional and revocable consent at any time, will be stored for a maximum of 24 months after the provision of the relevant consent;
- c) the legal protection of the Data Controller, and specifically in the case of legal disputes, they will be kept for the duration of such disputes, until the time limits for appeals have been exhausted.

The Data may also be stored for longer periods of time where necessary to fulfil statutory and/or legal obligations, as well as to ensure the judicial protection of the Company's rights, in compliance with ordinary limitation periods.

7. Data subjects rights

Users, as data subjects (i.e., subjects to whom the Data refer), are holders of rights conferred by the GDPR. In particular, pursuant to Articles 15-22 of the GDPR, data subjects have the right to request and obtain, at any time, access to their personal data, information on the processing carried out, rectification and/or updating of personal data, erasure and restriction of processing. They also have the right to object to the processing and to request data portability (i.e. to

receive their personal data in a structured, commonly used, machine-readable format). Finally, data subjects always have the right to withdraw their consent at any time (this, in any case, will not affect the lawfulness of the processing carried out on the basis of the consent given before the revocation) and to lodge a complaint with a supervisory authority (in Italy: the Garante per la Protezione dei Dati Personali).

8. Contact details

The above-mentioned rights may be exercised at any time, by simple request to the Data Controller:

- by e-mail: by post, to the address Via Luigi Galvani 1, 21020 Bodio Lomnago (VA), for the attention of the Head of Human Resources; or
- to the e-mail address privacy@enoplastic.com

For further information or clarification of the above rights, please contact the Company at the same address.

The Company may amend this policy to adapt it to future additions or changes to the Website.
Information updated on 04/04/2022

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