

**PRIVACY POLICY ACCORDING TO ARTICLE 13 OF THE GDPR****JOINT DATA CONTROLLER**

According to Article 26 of EU Regulation 2016/679 (hereinafter for the sake of brevity GDPR), the joint data controllers are:

**LFE HOLDINGS SRL** with registered offices in Granarolo dell'Emilia (BO), Via Don Minzoni 28-30-32, 40057 Frazione Cadriano;

**OLEOBI SRL** with registered offices in Granarolo dell'Emilia (BO), via Don Minzoni 28, 30, 32, 40057 Frazione Cadriano;

**SACE SRL** with registered offices in Sasso Marconi (BO), via Cartiera 154, 40037 Frazione Borgonuovo;

**PK SRL** with registered offices in Granarolo dell'Emilia (BO), via Andrea Costa 11/2, 40057 Frazione Cadriano;

**EBI MOTION CONTROLS SRL** with registered offices in Granarolo dell'Emilia (BO), via Andrea Costa 11/2, 40057, Frazione Cadriano.

Each of the Joint Data Controllers is considered the Data Controller for its customers, suppliers and user of the website, to which this privacy policy is provided.

Therefore, **SACE SRL**, (Tax Identification Number 01698441209), as the Data Controller of its own customers, suppliers, and users of the website, are informed that the personal data provided will be processed with the following methods and in compliance with the principles of the GDPR.

**1. Purpose and legal basis of the processing**

The personal data will be processed to:

1.1. conclude contracts with the Data Controller and manage the related relationships in the pre-contractual, contractual, fiscal and accounting phases; (the legal basis of the aforementioned processing is the fulfilment of both contractual and legal obligations to which the Data Controller is subject).

1.2. Direct marketing to customers already acquired for the direct sale of the Data Controller's products and/or services (sending of newsletters, information activities, market research, advertising communications); (the legal basis of the aforementioned processing is legitimate interest).

1.3. Direct marketing to new customers; (the legal basis of the aforementioned processing is consent).

**2. Data processing method and storage period**

The data processing will be carried out by the operations indicated in Article 4, No.2 of the GDPR in manual form using IT and telematic instruments. The data will be recorded, processed and stored in our paper and electronic archives.

The data will be processed by authorised people.

For the activities listed in article 1.1, the personal data will be stored until the processing of the same is no longer needed for the purpose for which it was collected and, in any case, not exceeding 10 years from the termination of the contractual relationship.

For the activities listed in articles 1.2 and 1.3, the personal data will be stored until

the processing of the same is no longer needed for the purpose for which it was collected and, in any case, not exceeding 2 years from the termination of the contractual relationship. (from their acquisition).

### 3. Data processing recipients

The data may be made accessible to the Data Controller's employees and/or collaborators in their capacity as persons authorised to process the data or data processors.

The data may be communicated for the obligations imposed by the law or for the correct execution of the contractual relationship, for example to social security, welfare and insurance bodies, trade associations, tax and labour offices, other Group companies, professional legal assistance offices, commercial, fiscal, auditing company, banks and credit institutions.

The data will not be disclosed to undetermined subjects.

### 4. Nature of the provision

The disclosure of data is mandatory for the purposes referred to in Article 1.1 .; therefore, any refusal to provide such data or incorrect communication results in the objective impossibility for the writer to manage the pre-contractual and contractual relations.

On the other hand, the communication of data for the purposes referred to in Articles 1.2. and 1.3. is optional. Therefore, you can decide to provide data or, subsequently, exercise the right of opposition pursuant to Article 21 GDPR.

In this case, your personal data will no longer be the subject of direct marketing

(and you will no longer receive newsletters, advertising communications, etc.) but will continue to be entitled to the services referred to in Article 1.1.

### 5. The Data Subject's Rights

In your office as Data Subject, you have the right to exercise the rights referred to in Article 15 GDPR and precisely the right to:

I. obtain confirmation of the existence or not of personal data concerning you and, in this case, obtain access to the data;

II. obtain access to the following information: a) purpose of the processing; b) categories of personal data in question; c) recipients or categories of recipients to whom personal data has been or will be communicated; d) when possible, the storage period of personal data provided or, if this is not possible, the criteria used to determine this period; e) the existence of the right of the data subject to request the data controller to rectify or delete personal data or limit the processing of his or her personal data or to oppose processing thereof; f) the right to lodge a complaint with a supervisory authority; g) if the data is not collected from the data subject, all available information on the origin thereof; h) the existence of an automated decision-making process, including profiling pursuant to Article 22, paragraphs 1 and 4, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of this processing for the data subject;

III. be informed of the existence of adequate guarantees pursuant to Article 46 relating to the transfer of personal data to a third country or an international organisation;

IV. where applicable, the data subject may exercise the rights referred to in Articles from 16 to 21 GDPR (right of rectification, right to cancellation "right to be forgotten", right to limitation of processing, right to data portability, right of opposition);

V. the data subject may also: a) withdraw the consent at any time without affecting the lawfulness of the processing based on the consent given before the revocation; b) receive timely notification of any violation of personal data within the limits of what is indicated in Article 34; c) make a complaint to the Data Protection Authority.

## 6. How to exercise the rights

The data subject may exercise his or her rights against any of the joint data controllers.

To exercise his or her rights, the data subject can contact the following data controller: SACE SRL, via Don Cartiera 154, 40037 Borgonuovo di Sasso Marconi (Bo), by sending written notification to the company's registered office or by sending an e-mail to the address [comitatoprivacy@lfeholdings.com](mailto:comitatoprivacy@lfeholdings.com)