

PRIVACY POLICY

Notice under Articles 13 and 14 of EU Regulation no. 2016/679

Pursuant to Articles 13 and 14 of EU Regulation no. 2016/679 (hereinafter "GDPR 2016/679") and Article 13 of Legislative Decree 196/2003 (hereinafter "Privacy Code")—together with any other national or European provision and any subsequent national and/or European standards of adaptation/update—containing provisions for the protection of individuals and other subjects regarding the processing of personal data, we wish to inform you that the data provided by you will be processed in compliance with the above legislation. This document ("Privacy Policy") is intended to provide guidelines regarding the processing of data and information as specified below that you will provide to Icotech Automation S.r.l., which will be processed by them and/or other designated entities for the purposes specified below.

1. Data Controller and/or Joint Controllers

The Data Controller is **Icotech Automation S.r.l.**, with its registered office in Nola (NA), CIS Isola 1 - Torre 1, and its administrative/operational headquarters located in Battipaglia (SA) at Via Filigalardi snc, VAT number 7836571211. The company can be contacted at this latter address and at the following email: segreteria@icotech.com.

2. Data Processor and Data Protection Officer (DPO)

The Data Controller has appointed Data Processors and a Data Protection Officer (DPO). The DPO can be contacted at: icotechautomation@legalmail.it. An updated list of any appointed Data Processors can be requested from the Data Controller or DPO by writing to the above certified email address or sending a letter to: Icotech Automation S.r.l., CIS Isola 1 - Torre 1, Nola (NA).

3. Categories of Personal Data Processed

Within the scope of the purposes and methods described in this Privacy Policy, the following types of data/information may be processed: "Personal Data," which may include personal identifiers (e.g., name, surname, company name, tax code, VAT number, etc.), contact details (e.g., phone number, email address, etc.), company details (e.g., company name, department, job title), administrative/fiscal data (e.g., bank details, IBAN, etc.), contract and administrative data (e.g., contract date, commercial relationship details, payment information), data collected from public sources (lists, registries, public documents accessible to anyone), etc.

In limited cases, and always in compliance with legal and/or regulatory provisions, the Data Controller may have access to and/or process special categories of data or judicial data as defined in Article 10 of the EU Regulation.

4. Purpose and Legal Basis of the Data Processing

The data collected will be processed for the following purposes and based on the legal grounds outlined below:

- 4.a) For the management of the relationship and/or contract/mandate between the parties, including during pre-contractual negotiations, and for the provision of the related services. There is no legal obligation to provide the data, but failure to do so will prevent the establishment and/or management of the relationship/contract. Legal basis: performance of the contract - legitimate interest of the Data Controller - compliance with legal obligations.
- 4.b) For the management of relations with public entities, institutions, and administrations, as well as with other public and/or private third parties, in connection with the relationship and/or contract between the parties and related legal obligations. If the processing is not legally required, failure to provide the data will prevent the establishment and/or management of the relationship/contract. Legal basis: performance of the contract - legitimate interest of the Data Controller - compliance with legal obligations.
- 4.c) For internal operational or management needs related to the contract/relationship between the parties. Legal basis: performance of the contract - legitimate interest of the Data Controller - compliance with legal obligations.
- 4.d) To respond to any requests from the data subject. Legal basis: performance of the contract - legitimate interest of the Data Controller - compliance with legal obligations.
- 4.e) For commercial promotion activities, including for new products/services, direct and indirect marketing activities, market research, customer satisfaction surveys, using any method (e.g., email, newsletters, online forms, fax, phone, mail, social media, etc.). Legal basis: legitimate interest of the Data Controller and/or consent and/or legal/regulatory provisions.
- 4.f) To fulfill general legal obligations and for the legitimate interest of the Data Controller; and for legal proceedings or to protect the rights and interests of the Data Controller (e.g., in case of non-performance, complaints, disputes, debt collection, etc.). Legal basis: performance of the contract - legitimate interest of the Data Controller - compliance with legal obligations.

The Data Controller's legitimate interest (under Article 6(1)(f) GDPR) mentioned in the points above includes actions to enforce or defend a legal right, prevent fraud, or ensure network and system security.

Regarding point 4.e, the legitimate interest also includes direct marketing activities.

No profiling activities are carried out by Icotech Automation S.r.l. However, should profiling be introduced in the future, it will be done in full compliance with data security and confidentiality requirements.

5. Data Processing Methods

The data will be processed manually or electronically, ensuring security and confidentiality, by personnel trained in compliance with applicable laws. Data will be stored in a computerized or paper archive. Updates, rectifications, or deletions of data will apply to all parties within the company.

6. Communication of Personal Data - Recipients

In relation to the purposes mentioned in section 4, personal data will be processed and/or may be made known to employees and/or collaborators of Icotech Automation S.r.l. and other subsidiaries/parent companies/affiliated companies; these subjects are formally appointed and authorized for the processing and receive appropriate operational instructions regarding the matter.

Furthermore, for the aforementioned purposes, data may be disclosed to:

- individuals, legal entities, companies, professional firms and/or professionals (e.g., legal advisors/lawyers, labor, fiscal, accounting, IT consultants, auditors, debt recovery agents, banks, financial institutions, agents, etc.), public and non-public entities, for the management of the relationship and/or contract/mandate in the interest of the parties and related obligations, for the protection and exercise of a contractual and/or legal right, including in judicial proceedings, for the fulfillment of a legal and/or contractual obligation;
- banks, credit institutions, entities involved in credit collection and/or recovery for the management of payments and/or credit collection, and for the management of the relationship and/or contract/mandate in the interest of the parties and related obligations;
- public authorities, public administrations, the judiciary, and/or law enforcement agencies, for the fulfillment of legal obligations, and/or to comply with requests from such authorities/administrations/entities.

The third parties mentioned above will act as independent data controllers and/or as processors.

The collected data will not be disclosed without your explicit consent, except for the necessary communications that may involve the transfer of data to public entities, consultants, or other subjects to fulfill legal obligations, to manage the relationship/contract in the interest of the parties, and in any case, as expressly provided by applicable legislation.

Personal data may be disclosed to the aforementioned subjects, even if this involves the transfer of such data to other countries within the European Union or to third countries, exclusively when necessary for processing related to the purposes mentioned above. Any transfer of data outside the European Union will be carried out by storing personal data in a highly secure “cloud” system managed by a certified partner of Icotech Automation S.r.l. Icotech Automation S.r.l. processes data lawfully and fairly, adopting appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the data.

7. Data Transfer

The data provided and/or processed for the execution of the contract/relationship between the parties and for the fulfillment of related legal and/or contractual obligations are stored and managed on the company’s server(s) located at the company premises. These data may, however, be transferred for the aforementioned purposes to recipients located in different countries, whether within the European Union or outside of it. In any case, Icotech Automation S.r.l. adopts appropriate protective measures to ensure the lawfulness and security of personal data transfers, for example, relying on the European Commission’s adequacy decisions or other guarantees or conditions deemed adequate for such transfers.

8. Data Retention Period

Data will be retained for the duration of the ongoing relationship and, in compliance with applicable laws, for a period of 10 years after the termination of the contract and/or for the statutory limitation period provided by the legislation for the protection of related rights, and/or, in case of litigation arising from the contract, for the duration of the dispute and for 10 years after the final judicial decision. Longer retention periods are reserved where required by specific sector regulations and/or to protect the legitimate interests of the data controller.

9. Rights of the Data Subject

We inform you that the data subject may exercise the rights recognized by applicable regulations, including but not limited to: the right (i) to access their personal data (and to know its origin, purposes, and processing methods, the data of the subjects to whom it is communicated, the retention period, or the criteria useful for determining it); (ii) to request its correction; (iii) to request its deletion (“right to be forgotten”) if no longer necessary, incomplete, erroneous, or collected in violation of the law; (iv) to request that the processing be limited to part of the information concerning them; (v) where technically feasible, to receive the information concerning them in a structured format or to transmit it to them or to third parties indicated by them (so-called “portability” of information concerning them and those they voluntarily provided); (vi) to withdraw their consent at any time, if consent is the basis for processing; the withdrawal of consent does not affect the lawfulness of the processing based on consent before the withdrawal.

As a data subject, you also have the right to object to the processing of your personal data, including profiling. These rights can be exercised by submitting a written request without formalities to the Data Controller at the contact provided in point 1 of this privacy notice. The Data Controller shall act on this without delay and, in any case, within one month of receiving the request. This period may be extended by two months if necessary, considering the complexity and number of requests received by the Controller. In such cases, the Controller will inform the data subject of the reasons for the extension within one month of receiving the request.

Icotech Automation S.r.l. reminds you that if you find the response to your request unsatisfactory, you may lodge a complaint with the Data Protection Authority (<http://www.garanteprivacy.it/>) as provided by applicable legislation.

10. Changes to this Privacy Notice

Without prejudice to the fact that Icotech Automation S.r.l. does not carry out any processing operations other than those expressly indicated and/or authorized and/or requested by each data subject, this Privacy Notice may be subject to changes to comply with new legal provisions or the company's evolving data processing policies. In case of relationships between legal entities, the privacy notice for any interested parties involved in the processing, such as employees/collaborators of the Client/Supplier, is issued by the Controller through the Client/Supplier. Each updated version of this Privacy Notice will be made available to interested parties.

Data Controller – Icotech Automation S.r.l.