PRIVACY INFORMATION STATEMENT FOR CUSTOMERS

In compliance with articles 13 and 14 of the General Data Protection Regulation

EU 2016/679 and Legislative Decree 101/2018

1. Contact details

Data Controller**: ISOIL INDUSTRIA SpA**
Via F.lli Gracchi 27 - 20092 Cinisello Balsamo – MI
Tel. +39 02 660271 - privacy@isoil.it - www.isoil.it

2. Purpose of processing

The Data Controller may acquire the following personal data of **its customers** within the scope of the services offered:

- Company name, VAT Reg. No., address, telephone number and email address;
- Name and surname and contact details of the reference employee

3. Purpose of data processing

Personal data is processed without express consent for the following purposes (article 6 of the GDPR EU 2016/679):

- Take on orders;
- Manage orders and order confirmations;
- Manage shipments;
- Deal with the owner company;
- Manage billing;
- Manage payments;
- Conduct any credit collection activities, when required, and ensure the legal protection of the company in case of non-payment by the customer;
- Exercise legal protection rights, when required, in case of disputes with the customer.

4. Processing methods, guidelines and preservation times

The customer's personal data is processed through the operations envisaged in article 4 of the GDPR EU 2016/679 and in particular: collecting, recording, sorting, storing, consulting, altering, processing, modifying, selecting, extracting, comparing, using, inter-connecting, blocking, restricting, disclosing, erasing and destroying the data. The data subject's personal data is subject to both manual and electronic processing. The Data Controller shall keep the personal data for the time necessary to pursue the above purposes. In particular, administrative and supporting documentation will be kept in the company's archives for a period of 10 years.

5. Accessing data

The customer's personal data may be accessed by the following persons or entities for the purposes envisaged in article 3:

- the Data Controller's employees and collaborators in their capacity as data processors;
- companies or third parties, such as: accountants and the board of statutory auditors

6. Disclosing personal data

The Data Controller may disclose the personal data of the data subjects to the following entities for purposes envisaged in article 3 without requiring express consent (article 6 of the GDPR EU 2016/679):

- Legal authorities;
- Revenue offices;

- Credit institutions;
- Companies or firms assigned each time solely for the purpose of ensuring legal protection and protect the company's legitimate interests, where applicable.

Said entities shall process the personal data in their capacity as independent data controllers. Personal data will not be disseminated.

7. Sources

The personal data subject to processing may be gathered through a reference person, specified by the customer.

8. Transfer of personal data to third party countries

Personal data will not be transferred to countries outside the EU.

9. Provision of personal data and consequences for failing to do so

Providing personal data as per section 2 is strictly necessary. Failing this will prevent the company from ensuring the Services outlined in section 3 and fulfilling the related law obligations.

10. Rights of the Data Subject

In compliance with the General Data Protection Regulation EU 2016/679, Chapter III:

1. Data subjects have the right to obtain confirmation as to whether or not personal data concerning them exist, regardless of their being already recorded; the communication of such data shall be in intelligible form.
2. Data subjects have the right to obtain information about: the origin of personal data; the purposes and methods of the processing; the logic applied to data processing with the help of electronic means; the identification details of the data controller, data processors and representative; the entities or categories of entities to whom the personal data may be disclosed, who or which may gain such data as designated representative in the State's territory, or as data processor or person in charge of data processing.
3. The data subject is entitled to obtain the following:
   a. Update, amend or add data when required;
   b. Delete, anonymise or block data that has been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
   c. Attest that the actions as per letters (a) and (b) have been notified to the entities to whom the data was disclosed, also as a far as their respective content, unless this requirement proves impossible to fulfil or involves a disproportionate use of resources in relation to the right to be protected;
   d. copy of the information in our possession in a commonly used and machine-readable format;
   e. restrict data processing that concerns the data subject or object, for legitimate reasons, to the processing of personal data concerning the data subject, in whole or in part, even though they are relevant to the purpose of the collection;

Moreover, the data subject has the right to:

   f. withdraw the consent at any time without prejudice to the lawfulness of the processing based on the consent provided prior to the withdrawal;
   g. lodge a complaint to a supervisory authority;

The data subject may request the data controller a "DECLARATION OF COMPLIANCE" that can certify that the requests made are actually resolved and brought to the attention of those to whom the personal data was disseminated or disclosed previously.
As data subject, the customer may delegate a third person with copy of an authorisation or proxy signed in the presence of an assigned person or signed and filed along with a non-certified photocopy of the data subject's identification document. The data controller must respond to the request within 30 days after receipt or within another 30 days in case the response is problematic; however, a written notification of the reasons for the delay shall be provided within the thirtieth day. The data subject may exercise its rights at any time by forwarding a registered letter or an email to the Data Controller's address.

PRIVACY INFORMATION STATEMENT FOR SUPPLIERS

In compliance with articles 13 and 14 of the General Data Protection Regulation EU 2016/679 and Legislative Decree 101/2018

Isoil Industria SpA as data controller, hereby declares that in selecting and managing suppliers, the latter may process their personal data, including those of any employees and reference collaborators of the supplier. Said personal data will be used solely for the purposes and according to the methods outlined hereafter.

11. Contact details

Data Controller: ISOIL INDUSTRIA SpA
Via F.lli Gracchi 27 - 20092 Cinisello Balsamo – MI - Tel. +39 02 660271 - privacy@isoil.it - www.isoil.it

12. Purpose of processing

The Data Controller may acquire the following personal data of **its suppliers** within the scope of the services offered:

- Company name, VAT Reg. No., address, telephone number and IBAN code;
- Name and surname and contact details of the reference employee

13. Data processing purposes and legal basis

Personal data is processed without express consent for the following purposes (article 6 of the GDPR EU 2016/679):

- Ensure the execution of a contract involving the data subject, when required, or the execution of pre-contractual measures adopted upon request of the latter;
- Acquire and record supply orders;
- Manage payments and record invoices;
- Fulfil obligations of law associated with invoicing of accounts payable;
- Ensure legal protection, when required in case of disputes with the Supplier.

14. Processing methods, guidelines and preservation times

Personal data is processed through the operations envisaged in article 4 of the GDPR EU 2016/679 and in particular: collecting, recording, sorting, storing, consulting, altering, processing, modifying, selecting, extracting, comparing, using, inter-connecting, blocking, restricting, disclosing, erasing and destroying the data. The data subject's personal data is subject to both manual and electronic processing. The Data Controller shall keep the personal data for the time necessary to pursue the above purposes. In particular, administrative and supporting documentation will be kept in the company's archives for a period of 10 years after being issued.

15. Recipients of personal data

Personal data will not be "disseminated", namely it will not be disclosed to unidentified people; however, said data will be "communicated", namely disclosed to identified people, as described below:

a. Persons authorised by the Data Controller pursuant to article 29 of the GDPR: employees in charge of selecting suppliers and supervising the intervention; ensuring contractual obligations or work contracts in force from and administrative standpoint;
b. Persons acting typically as Data Processors pursuant to article 28 of the GDPR, namely:
   - the accounting firm which our Company relies on for administrative, accounting and tax purposes.

Only the category of recipients is specified for the above entities as it is subject to frequent updates and revisions. Therefore, data subjects may request an updated list of recipients by contacting the Data Controller.

c. Persons acting typically as independent Data Controller to fulfil contractual obligations and provisions of law, namely:

   - Public or private entities who can access the personal data pursuant to law or regulations within the limits set out by said laws (legal authorities, revenue offices)
   - Persons who have the need to access the personal data for ancillary purposes with respect to the relationship existing between you and our company, strictly within the limits necessary to fulfil ancillary

- tasks assigned to them (e.g. credit institutions).

16. Transfer of personal data to third party countries

Personal data will not be disclosed or transferred to third parties within the scope of the purposes outlined in section 4 of this privacy information statement, in countries that are not part of the EU, unless authorised beforehand by the data subject.

17. Source

The personal data subject to processing may be gathered through a reference person, specified by the supplier.

18. Provision of personal data and consequences for failing to do so

Providing personal data as per section 3 is strictly necessary. Failing this will prevent the company from fulfilling the work agreements and the related law obligations.

19. Rights of the Data Subject

According to the GDPR EU 2016/679, Chapter III:

1. Data subjects have the right to obtain confirmation as to whether or not personal data concerning them exist, regardless of their being already recorded; the communication of such data shall be in intelligible form.
2. Data subjects have the right to obtain information about: the origin of personal data; the purposes and methods of the processing; the logic applied to data processing with the help of electronic means; the identification details of the data controller, data processors and representative; the entities or categories of entities to whom the personal data may be disclosed or who may gain such data as designated representative in the State's territory, or as data processor or person in charge of data processing.
3. The data subject is entitled to obtain the following:
   a. Update, amend or add data when required;
   b. Delete, anonymise or block data that has been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
   c. Attest that the actions as per letters (a) and (b) have been notified to the entities to whom the data was disclosed, also as a far as their respective content, unless this requirement proves impossible to fulfil or involves a disproportionate use of resources in relation to the right to be protected;
   d. copy of the information in our possession in a commonly used and machine-readable format;
   e. restrict data processing that concerns the data subject or object to its processing, in whole or in part: for legitimate reasons to the processing of personal data concerning the data subject, even though they are relevant to the purpose of the collection;
   f. Moreover, the data subject has the right to:
   g. withdraw the consent at any time without prejudice to the lawfulness of the processing based on the consent provided prior to the withdrawal;
   h. lodge a complaint to a supervisory authority;

The data subject may request the data controller a "DECLARATION OF COMPLIANCE" that can certify that the requests made are actually resolved and brought to the attention of those to whom the personal data was disseminated or disclosed previously.

As data subject, the supplier may delegate a third person with copy of an authorisation or proxy signed in the presence of an assigned person or signed and filed along with an uncertified photocopy of the data subject's identification document. The data controller must respond to the request within 30 days after receipt or within another 30 days in case the response is problematic; however, a written notification of the reasons for the delay shall be provided within the thirtieth day. The data subject may exercise its rights at any time by forwarding a registered letter or an email to the Data Controller's