

## **Personal data processing information statement pursuant to articles 13-14 of EU Regulation 2016/679**

**Data subjects: Customers and/or contact persons at Customers' companies.**

**Ceramiche Caesar S.p.A., FAP division**, in its capacity as Data Controller of your personal data, pursuant to and in accordance with the European Regulation 2016/679 herein "GDPR", hereby informs you that the aforementioned regulation establishes the protection of data subjects as regards personal data processing and that said processing will be grounded in the principles of propriety, lawfulness, transparency and shall ensure the protection of your confidentiality and rights.

Your personal data will be processed in compliance with legislative provisions of the aforementioned regulation and all confidentiality obligations set forth therein.

**Purposes and legal basis of the processing:** your data will be processed for the following purposes related to the implementation of fulfilments related to legislative obligations:

- compulsory legal fulfilments in fiscal and accounting sector;
- litigation management;
- obligations under applicable laws.

Your data will also be used for the following purposes relating to the execution of measures connected with contractual or pre-contractual obligations:

- after-sales assistance;
- customer care relating to the management of sales operations;
- management of the sales agreement and related tasks, including pre-contractual activities and shipping;
- customers' management;
- quality management;
- handling of any returns/claims or after-sales service activities;
- customer satisfaction survey;
- customers' invoices history.

Your data will also be used for the following purposes necessary for the pursuit of the legitimate interest of the Controller:

- marketing activities for the sending of communications by e-mail for marketing purposes about their products and services, similar to those already purchased, unless the data subject refuses the processing initially or on the occasion of subsequent communications. You may object to processing at any time by using the link at the foot of the message or by sending a request to the Controller, using the contact details provided in this information statement.

With regard to the above-mentioned purposes, if you are an employee/contact person of the customer/legal entity, your data will be processed by the need to interact, through you, with the customer/legal entity

**Processing method.** Your personal data can be processed as follows:

- by means of electronic computers using software systems managed by third parties;
- disclosed to third parties for processing operations;
- BY ENTERING THEM INTO THE CONTROLLER'S CORPORATE CRM;
- automated calling methods (e-mail);
- platform for sending corporate communications;
- report: In order to compare and possibly improve the results of communications, the Data Controller uses systems for the sending of newsletters and promotional notifications with reports. By means of said reports, the Controller can find out, for example: the number of readers, openings, one-time "clickers" and clicks, details on the activity of individual users; details of e-mails sent according to date/time/minute; details of emails delivered or not, of forwarded e-mails; the list of those who unsubscribed from the newsletter; who opened an e-mail or clicked on a single link; users who experienced problems in viewing the message;
- processed by electronic computers;
- manually processed in paper files..

Each processing is carried out in compliance with the methods specified in Articles 6, 32 of the GDPR and by adopting the appropriate security measures.

Your data will be processed exclusively by staff explicitly authorised by the Controller and specifically, by the following categories of operators:

- agents and representatives;
- General management;
- executives;
- Accounting department;

- Commercial department;
- Logistics department;
- Marketing department.

**Communication:** Your data may be communicated to external parties for the proper management of the relationship and in particular to the following categories of recipients who act as autonomous and duly appointed Data Controllers or Data Processors:

- banks and credit institutions;
- consultants and professionals, even associates;
- within the scope of public and/or private entities to which data disclosure is compulsory for the fulfilment of legal requirements, or functional for relations administration;
- group companies as per intra-group agreements;
- external companies providing hardware, software, cloud services including electronic invoicing;
- forwarders, transporters, carriers, post services, logistics companies.

**Disclosure:** Your personal data shall not be disclosed anyhow.

**Transfer of personal data:**

- A) Your personal data may also be transferred, limited to the above mentioned purposes, to countries of the EU.

**Period of data retention.** Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 of the GDPR, the period of retention of your personal data is:

- established for a period of time not exceeding the achievement of the purposes for which data is collected and processed for the performance and fulfilment of contractual purposes;
- established for a period of time not exceeding the achievement of the purposes for which data is collected and processed and in compliance with the mandatory time limits prescribed by law;
- for marketing activities, established for a period of time not exceeding the fulfilment of the purposes for which they are collected and until the data subject objects.

**Data Controller:** the Data Controller, in accordance with the Law, is Ceramiche Caesar S.p.A. FAP division, Via Canaletto 49 - 41042 Spezzano di Fiorano (Mo); VAT 00179660360; can be contacted at the following addresses: E-mail: [privacy@fapceramiche.com](mailto:privacy@fapceramiche.com); Telephone: +39 0536 837 511 in the person of its legal representative pro tempore.

You have the right to obtain erasure (right to be forgotten), limitation, updating, amendment, portability from the controller, as well as the right to oppose the processing of your personal data and in general, you can also exercise all rights specified in articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR. You may also lodge a complaint with the competent supervisory authority if you consider that the processing of your data is contrary to the legislation in force.

**Extract EU Reg. 2016/ 679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the data subject**

1. The data subject is entitled to obtain confirmation as to the existence or otherwise of personal data concerning them, even if said data has not yet been recorded, the disclosure of said data in intelligible form, and to lodge a complaint with the Supervisory Authority.
2. The data subject has the right to receive the following information:
  - a. the origin of personal data;
  - b. the purposes and processing methods;
  - c. the logic applied in case of processing carried out by electronic instruments;
  - d. the identification details of the data controller, of the processors and of the appointed representative according to art. 5, para. 2;
  - e. the subjects or subject categories to whom the personal data can be disclosed or come into the knowledge thereof, in their capacity as appointed representative in the State, data supervisors or processors.
3. The data subject is entitled to obtain:
  - a. the updating, correction or, if he/she is interested in this, the integration of the data;
  - b. the erasure and transformation into anonymous form of any unlawfully processed data or data blocks, including those whose retention is not required in relation to purposes for which data were collected or successively processed;
  - c. certification that operations specified in letters a) and b) have been disclosed, together with their content, to the people to which data has been disclosed or provided, unless this proves impossible or requires the use of means clearly disproportionate to the right being protected;
  - d. data portability.

4. The data subject is entitled to raise a total or partial objection:

- a. for legitimate reasons, to the processing of personal data concerning them, even if pertaining to the purpose of collection;
- b. to the processing of his/her own personal data for the sending of advertising materials, for direct sale, or for carrying out market surveys or commercial reporting.