

## Policy pursuant to articles 13 and 14 of Reg. EU 2016/679 for **MARKETING** activities towards potential customers

According to EU Regulation 2016/679, which confirms the provisions of Italian legislation since December 2011, data concerning legal persons, entities and associations are not “personal data”, therefore, it would not be necessary to comply with the obligations established by the current legislation on the protection of personal data for their processing. However, given that potential customers include subjects who fall under the definition of “natural persons” and that even in the sphere of marketing activities, personal data may be processed that relate to natural persons who have relationships with the customer (employees, collaborators, etc.), CAPP Plast Srl always keeps this document available. This document allows all stakeholders, even those excluded from the scope of protection of the legislation in question, to see the policies adopted to process information and personal data, which will always be based on principles of correctness, lawfulness and transparency in full compliance with the right to confidentiality.

### 1. ORIGIN OF THE DATA

The contact details used to initiate the first contact are provided by the data subject or by subjects authorised by them or by public registers, lists, deeds or documents that can be made available by anyone or from lists purchased by authorised third parties.

### 2. PROCESSED DATA:

In addition to the aforementioned data, any information acquired by the data subject in the course of interviews/market surveys by any means carried out (hard copy questionnaires, telephone interviews, compilation of on-line forms, etc.) will be processed.

### 3. PURPOSES AND LEGAL BASIS FOR THE PROCESSING

The purposes of the processing covered by this policy are:

- a. to initiate an initial contact to request an expression of interest from the *data subjects* and to comply with the obligations laid down by the legislation on the protection of personal data;
- b. commercial activities: marketing, advertising, special offers. In particular, contact details, postal and email addresses may be used for sending courtesy communications and/or promotional/information material on the products and commercial initiatives of CAPP Plast Srl;
- d. to carry out market surveys to improve our products/services;
- f. to satisfy requests for information from data subjects.

The processing can be carried out provided that they meet the purposes indicated above:

- > because they are required in order to comply with a regulatory obligation
- > because they are required to meet possible requests from the data subjects
- > because they are required to pursue a legitimate interest of the data controller, in line with the initiation of the initial contact with subjects who are potentially interested in their product, especially for the purpose referred to in letter a.
- > because they come from public registers which are freely accessible and/or made openly public by the data subject, in particular for the purposes referred to in letters a -d
- > since the consent of the data subject has been acquired, in particular for the purposes referred to in letter b.

### 4. PROCESSING METHOD and data retention

The processing of personal data may be performed using paper, IT and telematic tools for the above-mentioned purposes. Guaranteeing, at all times, absolute confidentiality and relevance which does not exceed the purposes described above, in terms of data recording and retention periods.

The email addresses and other contact details, for which the data party has also granted use for commercial purposes, will be retained for 12 months following the last mailing/contact with the data subject or the revocation of consent, in the latter case, for data subjects who do not have a contractual relationship with the data controller, in order to satisfy the request of the data subject and not to repeat unwanted communications, even accidentally.

### 5. WHO CAN PROCESS THE DATA

The data may be processed for the same purposes, always and only within the limits of what is actually necessary to carry out their tasks, by:

- sales staff and IT management staff;
- external parties, such as our consultants or suppliers, who are involved in the above-mentioned activities and delegated to be in charge of them (ART. 28 REG. EU 2016/679) or designated as appointees (ART. 28 REG. EU 2016/679)

### 6. FIELD OF COMMUNICATIONS - TO WHOM THE DATA MAY BE COMMUNICATED

The personal data in question may always be disclosed within the European Union:

- to subsidiaries, parent companies or otherwise associated companies,
- to our consultants, within the limits necessary to carry out their tasks at our company, subject to our letter of appointment which imposes the obligation of confidentiality and security,
- to other subjects who need to access your data for purposes related to the organisation of events or to carry out market surveys;

who will have full ownership of the processing carried out at their own facilities.

Of course, all the communications described above are limited only to the data necessary for the recipient to perform their duties and/or achieve the purposes linked to the communication.

## 6.1 TRANSFER ABROAD.

Personal data will be transferred to subjects located outside the European Union to the country, in which the data subject resides or is located, only to fulfil legitimacy conditions referred to in point 3 and in compliance with current legislation.

## 7. DISCLOSURE

The data will not to be disclosed

## 8. Data provision and consent

The communication and updating of your data, as well as the consent to their processing, are obviously optional. If not provided, there will be no consequence except for the fact that the data subject will not be involved in the initiatives promoted by CAPP Plast srl. It should be noted that any consent given may be revoked at any time without affecting the lawfulness of the processing carried out before the revocation.

## 9. DATA CONTROLLER

The data controller in question is **Capp-Plast S.r.l.** - registered office Via Galcianese, 107 G - 59100 Prato (PO) Italy - VAT No. 00244390977 - tel. +39 0574 43811

## 10. DATA SUBJECT'S RIGHTS.

The data subject has the right:

- > to ask the data controller to access personal data and correct or erase them or limit the processing of personal data concerning him/her and to object their processing,
- > if the processing is carried out by automated (computer) means and on the basis of consent, to receive personal data concerning him/her in a structured format, which is commonly used and can be read by an automatic device and/or to obtain direct transmission to another data controller, if technically feasible
- > to withdraw his/her consent at any time (without prejudice to the lawfulness of the processing based on consent before the revocation), obviously this also applies to processing carried out on the basis of this assumption
- > to lodge a complaint with a supervisory authority: Garante per la protezione dei dati personali - Piazza di Monte Citorio n. 121 00186 ROME - Fax: (+39) 06.69677.3785 - Telephone switchboard: (+39) 06.696771 - Email: garante@gpdp.it - posta certificata protocollo@pec.gpdp.it

To assert their rights, data subjects can contact the data controller, who can be reached through the addresses given above or by writing to **privacy@capp-plast.com**, bearing in mind that personal data cannot be communicated by phone if there is no security on the identity of the caller and that in other cases the data subject must be also identified with certainty.