

Policy

(in compliance with “Codice in materia di protezione dei dati personali – Personal Data Protection Code”, D.Lgs. n. 196/2003)

1. Introduction

GUALAPACK S.p.A., as “Data Controller” of the processing, wishes with this policy to inform you about the processing of your personal data, in compliance with the current Italian legislation for the protection of personal data(D.Lgs. n 196/03).

2. Source of personal data

Personal data hold by the Company are provided, also through distance communication techniques used by the Company itself (such as the website), directly by the subject of personal data ("person concerned"). Personal data can also be acquired by the Company in its business activity or by third parties for purposes of commercial information, market research, direct offers of products or services. In this last case, the Company will take care that all people concerned receive the information mentioned in the introduction to the registration act of data related to them or, anyway, not later than at the receipt of the first communication.

3. Processing purposes

Personal data are processed during the normal Company business for the following purposes:

- a) execution of obligations descending from agreements made by the Company and/or fulfilment, before the contract conclusion, of specific requests by the person concerned;
- b) fulfilment of obligations by law, regulations or EU directive;
- c) activities functional to Company marketing processes, performed through letter, phone, texts, internet, advertisement material, computerized communication systems, newsletters, profiling activities also for further customized advertisement campaign etc., in relation to which the person concerned has the right to give or refuse his consent. In particular, the Company will be able to perform activity related to:
 - market research to evaluate the satisfaction rate of the person concerned in relation to the quality of the services provided and the activity performed by the Company and the other corporations belonging to the group it is part of, accomplished directly or through specialized parties.
 - commercial information, offers of products/services of the Company and other companies of the group it is part of, dispatch of newsletter, performed directly or through specialized parties;
 - commercial information and products/services offers of third parties directly performed by the Company;

In relation to the purposes expressed in points a) and b), we inform you that the processing of your personal data by the Company, including the communication of the data themselves to subjects specified in the following paragraph 6, does not need your consent as the processing is necessary for Policy (in compliance with “Codice in materia di protezione dei dati personali – Personal Data Protection Code”, D.Lgs. n. 196/2003)

4. Data processing procedures

In relation to the purposes outlined in the previous paragraph, the personal data processing takes place through manual, IT and telematic tools with logics strictly related to the above-mentioned

purposes and, anyway, in a way that guarantees the safety and confidentiality of data themselves (with particular care when telematic communication techniques are used).

5. Categories of data processed

In the range of purposes outlined in the previous paragraph 3, the Company does not process personal data defined as “sensitive” (ex.: personal data disclosing racial and ethnic origin, religion beliefs, political opinions, data disclosing health status, sexual life etc.) and “judiciary” data. Particularly, the processing performed by the Company is referred to personal data related to customers or potential customers as business name and in general data that identify the client company and the related reference figures. For these reasons we invite to avoid the communication of "sensitive" or "judiciary" personal data. If the Company, for business reasons, needs to process "sensitive" data, the Company itself will take care of sending you an integration to the present policy and the related request of consent to process.

6. Categories of subjects to which data can be communicated or that can know them as data processors or persons in charge of the processing

To accomplish the purposes outlined in paragraph 3 the Company may need to give access to your personal data to third parties performing:

- consultancy services in the commercial and financial sector, banks, holding companies and insurances (only if necessary to the execution of the contract);
- control compliance, review and certification of Company activities also in the customers' interest;
- acquisition services, processing and elaboration of data needed for the execution of disposition received from the clientele;
- services for the management and maintenance of the Company IT system and telecommunication network (including email service);
- transmission activities, packaging, transport and sorting of communications for the person concerned;

that represents:

- authorities or supervisory and control boards;
- other corporations of the group GUALAPACK S.p.A is part of or controlling, controlled or connected companies

that performs:

- documents storing activities and data entry;
- customer support activities (such as, call centre, help desk, etc.);
- surveys or companies in the area of support and counselling relationships;
- market research aimed at gathering the satisfaction rate of the clientele about the services quality and the activities performed by the Company;
- promotion and selling activities of products/services of the Company and other corporations of the group it is part of;

Subjects included in the above-mentioned categories work in complete autonomy as separated Data Controllers of the processing or as Data Supervisors or Persons in charge for the purposes established by the Company, whose constantly updated list is available at the Company offices. Your personal data may be known by the Company employees, who have been nominated Data Controllers or Persons in charge of the processing.

Your personal data may also circulate inside the group GUALAPACK S.p.A. is part of for purposes outline in paragraph 3. The processed data are not disclosed.

7. Rights of the person concerned

In the end, we inform you that the Personal Data Protection Policy gives the person concerned the possibility to exert specific rights. In particular, the person concerned can obtain:

- i. confirmation of the existence of data related to him, even if not registered yet, and their communication in a readable format;
- ii. information about the origin of his personal data, the processing purposes and procedures as well as the logic applied in case of electronic processing;
- iii. indication of the identification details of the Data Controller and person in charge of the processing as well as of the subjects or subjects categories to whom personal data can be communicated or who may get to know them;
- iv. cancellation, transformation in anonymous form or interruption of the processed data under law violation, as well as the update, rectification or, if pertinent, the data integration. The person concerned may also take position, for legitimate reasons, against the processing of personal data related to him, even if in line with the purpose of the collection. He may also take position against his personal data processing aimed at sending advertisement materials or direct sale or at performing market research or commercial communications.

8. Data Controller and person in charge of the processing

The personal data controller mentioned in this policy is GUALAPACK S.p.A - Via Carlo Mussa 266, Castellazzo Bormida, (AL), REA registration n. 01252890064 . The Company has appointed as person in charge for the acknowledgement to the person concerned, in case any of the rights outlined in paragraph 7 are exercised according to the procedures described in art.10, the person in charge of the processing, business address at the office in via Carlo Mussa 266, Castellazzo Bormida (AL).

The requests referred to in the previous paragraph 7 may be sent to the above-mentioned person in charge in writing or via email at privacy@gualapack.com

In the end, the requests referred to in the previous paragraph 7, lett. i), ii) and iii) may be expressed also verbally by contacting the above-mentioned person.

The continuously updated list of the persons in charge of the processing is available at the Company headquarters.