

Mod. ICONT - Updated 09/2025

Privacy Notice for the Processing of Personal Data

Pursuant to Article 13 of EUROPEAN REGULATION No. 679/2016

Dear Data Subject,

FIP MEC Srl, as Data Controller, pursuant to Article 13 of European Regulation No. 679/2016 “General Data Protection Regulation (GDPR)” (hereinafter the “EU Regulation”), provides you with the following information regarding the processing of your personal data.

The Regulation requires that any processing of personal data be carried out in accordance with the principles of lawfulness, fairness and transparency, while ensuring the protection of confidentiality and the safeguarding of the rights of the data subject.

For the purposes of this notice, “processing of personal data” means any operation or set of operations performed on personal data, such as collection, recording, organisation, storage, consultation, use, modification, disclosure, restriction or deletion.

1. Data Controller

The Data Controller is FIP MEC Srl, with registered office at Via Scapacchio, 41 - 35030 Selvazzano Dentro (PD), Tax Code and VAT No. 01049070251, which can be contacted at the following details: telephone +39 0498225511, e-mail: info@fipmec.it.

2. Nature of the Data Processed, Purposes and Legal Basis of the Processing

The personal data processed are ordinary personal data, such as:

company identification data (name, surname, e-mail, etc.).

No special categories of personal data are processed.

Purposes of the processing. Your personal data will be processed for the following purposes:

- A. To respond to requests submitted by completing the contact form available in this section of the website.
- B. To comply with obligations provided for by laws, regulations or EU legislation.
- C. To send advertising material, commercial communications, newsletters, market research and promotional information relating to the activities, products and services offered by the Data Controller.

Legal basis of the processing. Personal data, for the purposes referred to in points 2A and 2B, will be lawfully processed in order to fulfil pre-contractual and contractual obligations between us and the user (Art. 6(1)(b)) and to comply with our legal obligations (Art. 6(1)(c)).

Your personal data, for the purpose referred to in point 2C of this notice, may be lawfully processed only with your prior consent (Art. 6(1)(a) EU Regulation), which must be specific, separate, express, documented, prior and entirely optional.

Given consent may be withdrawn at any time, without affecting the lawfulness of processing carried out before withdrawal (Art. 7(3) GDPR).

In accordance with Article 21 GDPR, you may at any time deny the right to the processing of your personal data for direct marketing purposes.

Should you decide to provide consent for marketing purposes, your data may be used for activities including, but not limited to:

1. Sending promotional and informational communications (e.g. newsletters);
2. Sending commercial communications via traditional or electronic means such as email, telephone, SMS, WhatsApp, MMS, fax or other digital communication channels;
3. Sending invitations to events, trade fairs, meetings or promotional initiatives;
4. Sending updates regarding products, services, training activities, technical news or customer satisfaction surveys.

3. Data Recipients and methods of processing; existence of automated decision-making, including profiling

The processing of your personal data will be carried out in accordance with the principles of lawfulness, fairness and transparency, using both paper and electronic means.

Personal data may be processed by employees and collaborators of the Company who are duly authorised to process personal data, as well as by external parties appointed to carry out specific activities on behalf of the Data Controller, in their capacity as Data Processors pursuant to Article 28 of Regulation (EU) 2016/679.

Such parties are formally appointed by the Data Controller and are required to ensure the confidentiality and security of personal data, adopting appropriate technical and organisational measures to prevent data loss, unlawful or incorrect use, and unauthorised access, in compliance with applicable data protection legislation.

For reasons of brevity, the updated list of Data Processors is available at the registered office of the Data Controller and may be consulted upon request.

Your personal data will not be disclosed and will not be transferred to third countries or international organisations. They will not be communicated to third parties except where required by law or necessary for contractual purposes.

Pursuant to Article 13(2)(f) and Article 14(2)(g) of Regulation (EU) 2016/679, please note that the Data Controller does not use automated decision-making processes, including profiling.

4. Data Retention Periods

Your personal data will be retained only for the time necessary to achieve the purposes for which they are processed, in accordance with the storage limitation principle set out in Regulation (EU) 2016/679, and in any case for the period required by applicable laws or contractual obligations, or until consent is withdrawn by the data subject where processing is based on consent.

In particular:

- with reference to the purposes indicated in points 2A–2B, personal data will be retained for the time strictly necessary to fulfil the purposes for which they were collected and to comply with legal and contractual obligations;
- with reference to the purpose indicated in point 2C (marketing), personal data will be retained for no longer than 24 months from the date of collection, unless consent is withdrawn earlier.

To ensure compliance with these retention periods, the Data Controller carries out periodic reviews of the data processed in order to verify whether their retention remains necessary and, where appropriate, to proceed with their deletion.

5. Access to Data (Categories of Recipients to Whom the Data May Be Disclosed)

We inform you that the personal data collected will not be disclosed and will not be communicated to third parties without your consent, except where such communication is necessary to comply with legal or contractual obligations, or where required by law.

In accordance with Article 13(1)(e) of Regulation (EU) 2016/679, the following persons or categories of persons may have access to your personal data in their capacity as authorised persons or Data Processors:

- shareholders, employees, collaborators and service providers of the Data Controller, both in Italy and abroad, duly authorised to process personal data (e.g. sales, technical, administrative or legal departments, system administrators, external professionals and service providers, etc.)
- partner companies and/or companies affiliated with the Data Controller, where their involvement is necessary for the fulfilment of the services requested.

Personal data may also be communicated to external parties appointed to carry out specific activities on behalf of the Data Controller, in their capacity as Data Processors pursuant to Article 28 of Regulation (EU) 2016/679. These parties process the data under specific contractual obligations that ensure confidentiality and security in the processing of personal data.

For reasons of brevity, the updated list of Data Processors is available at the registered office of the Data Controller and may be consulted upon request.

6. and 7. Communication and Transfer of Data

Without the need for your express consent (Art. 6(1)(b), (c) and (f) of the EU Regulation), the Data Controller may communicate your data for the purposes referred to in points 2A to 2B to supervisory bodies, judicial authorities, and other public or private bodies where such communication is required by law or necessary for the fulfilment of legal obligations.

Such parties will process the data in their capacity as independent Data Controllers.

Personal data are stored on devices located at the premises of the Data Controller or at providers within the European Union.

Your data will not be disclosed.

To ensure the security of data processing and any related transfers, the Data Controller uses only service providers that provide adequate guarantees regarding the implementation of appropriate

technical and organisational measures, ensuring that the processing complies with Regulation (EU) 2016/679.

Both with regard to data stored on its own devices and any data held by providers, the Data Controller has implemented appropriate technical and organisational measures to guarantee an adequate level of security, in full compliance with the EU Regulation.

8. Consequences of Failure to Provide the Data

The personal data referred to in points 2A–2B of this notice are necessary for the purposes indicated. Failure to provide such data may make it impossible for the Data Controller to process your request or to fulfil contractual and legal obligations.

The personal data referred to in point 2C, on the other hand, are optional. Refusal to provide such data will not entail any consequences and will not affect the handling of your request or the fulfilment of contractual and legal obligations.

You may therefore choose not to provide such data or withdraw your consent at any time with regard to the processing of personal data previously provided for the purposes indicated in point 2C.

9. Rights of the Data Subject

As a data subject, you have the rights referred to in Articles 15 to 22 of the EU Regulation, including the right to:

- obtain confirmation as to whether or not personal data concerning you are being processed and, where that is the case, obtain access to your personal data (right of access);
- receive information regarding the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom the data have been or will be disclosed (in particular where recipients are located in third countries or international organisations), as well as the envisaged period for which the data will be stored or the criteria used to determine that period; where the data are not collected directly from you, you also have the right to obtain any available information regarding their source;
- obtain the rectification of inaccurate personal data concerning you, including the completion of incomplete data (right to rectification);
- obtain the erasure of personal data concerning you (right to erasure);
- obtain restriction of processing in the cases provided for by the Regulation (right to restriction of processing);

- obtain data portability, i.e. receive the data from one controller in a structured, commonly used and machine-readable format and transmit them to another controller without hindrance (right to data portability);
- object at any time to the processing of personal data concerning you (right to object). In particular, pursuant to Article 21 of the EU Regulation, where personal data are processed for direct marketing purposes (including profiling), you have the right to object at any time to such processing. If you object to the processing for direct marketing purposes, the personal data will no longer be processed for those purposes;
- be informed of the existence of automated decision-making, including profiling, and, where applicable, obtain meaningful information about the logic involved and the significance and possible consequences of such processing for you.

- withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- lodge a complaint with a supervisory authority (Italian Data Protection Authority).

Please note that there may be conditions or limitations to the rights of the data subject. Therefore, for example, there is no certainty that the right to data portability applies in all cases, as this depends on the specific circumstances of the processing activity.

Similarly, if you object to the processing of your personal data, the Data Controller may continue the processing where there are compelling legitimate grounds that override your interests, rights and freedoms, or where the processing is necessary for the establishment, exercise or defence of legal claims.

10. How to Exercise Your Rights

You may exercise your rights at any time by contacting the Data Controller using one of the following methods:

- by sending a registered letter with return receipt to the registered office of the Company;
- by sending an e-mail to info@fipmec.it;

Or by contacting the Data Controller by telephone at: +39 049 8225511.

11. Minors

The services provided by the Data Controller and forming the subject of the relationship with you do not involve the intentional collection of personal data relating to minors. Should personal data concerning minors be inadvertently collected, the Data Controller will promptly delete such data upon request or notification from the data subject.

12. D.P.O. (D.P.O.) - Authorised Persons - Data Processors

Below we provide some information that must be brought to your attention, not only in order to comply with legal obligations, but also because transparency and fairness towards Data Subjects are a fundamental part of our business activities.

D.P.O. (Data Protection Officer) - R.P.D. (Data Protection Officer). You may also contact the Data Protection Officer to obtain information and submit requests concerning your data or to report service issues or any problem you may have encountered.

The Data Controller has appointed Mr. Nicola Ghinello as Data Protection Officer, who can be contacted at the following e-mail address: nicola.ghinello@dpo-rpd.com.

Authorised persons. The updated list of authorised persons processing the data is kept at the premises of the Data Controller.

Data processors. For the sake of brevity, the detailed list of such parties is available at our premises.