

INFORMATION REGARDING THE PROTECTION OF PERSONAL DATA PURSUANT TO REGULATION (EU) 2016/679 (“GDPR”)

1. DATA CONTROLLER

FPZ S.p.A. with registered office in Via F.lli Cervi, no. 16, 20863 Concorezzo MB, Italy, VAT No./Tax Code 05933070962, in the person of the *pro tempore* legal representative and as the Data Controller (hereinafter “**FPZ**” or “**Controller**”), it provides some information regarding the processing of personal data carried out as part of its commercial activity of supplying products and services and in relation to its own product catalog and that of the other two societies of the FPZ Group, Arivent S.r.l. and Doseuro S.r.l. (for example: side channel blowers, dosing pumps, industrial fans, etc.) (hereinafter the “Services”).

2. CONTACT DETAILS OF THE DATA PROTECTION OFFICER (DPO)

The designated DPO can be reached via e-mail at the following address: dpo@fpz.com

3. CATEGORIES OF DATA SUBJECTS AND PERSONAL DATA PROCESSED

3.1. The information herein concerns data relating to the following subjects:

- (i) physical persons who are customers and prospects;
 - (ii) physical persons acting in the name and/or on behalf of corporate customers and prospects (including, for example, *pro tempore* legal representatives, agents, contact persons, etc.);
- (hereinafter, collectively, the “**Data Subjects**” and, individually, the “**Data Subject**”).

3.2. The following common personal data may be processed, depending on the Data Subject: personal details, residence, contact details, including electronic addresses, tax code, VAT number, accounting data, bank details (hereinafter, the “**Personal Data**”).

4. PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA

PURPOSES (Why does the Controller collect Personal Data?)	LEGAL BASIS (Why can/must the Controller keep Personal Data?)
a) Implementation of pre-contractual activities (preparation of estimates, provision of information on the Services, etc.) – management and performance of the contract and therefore of	Performance of pre-contractual measures adopted at the request of the Data Subject or of a contract to which the Data Subject is a party.

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the consequent commercial relationship, provision of the Services (and related assistance), fulfilment of the related administrative, accounting and organisational/managerial obligations (including the development of new offers, compilation of master data lists, management of orders, etc.).	
b) Fulfilment of a legal obligation related to civil, tax (including those connected to invoicing) and administrative provisions, EU legislation, rules, codes or procedures approved by authorities and other competent institutions, as well as fulfilment of requests from the competent administrative or judicial authority and, more generally, from public entities in compliance with legal formalities.	Fulfilment of a legal obligation applicable to FPZ.
c) Enforcement and protection of its rights, including through out-of-court initiatives and also via third parties, as well as prevention, detection and dissuasion of fraudulent, dangerous, unauthorised or illegal activities and crimes (such as, for example, fraud, identity theft, etc.).	Pursuit of the legitimate interest of FPZ.
d) Management of promotional contacts and therefore receipt of communications (including the newsletter): <i>d) no. 1.</i> – commercial communications (for example, by mail, SMS and even e-mails) for the offer and promotion of the Services and information on FPZ and two companies of group, Arivent S.r.l. and Doseuro S.r.l. activities and initiatives (such as workshops, invitations to events, portfolios, completed projects, etc.), as well as updates on the Services (such as	Pursuant to art. 130, paragraph 4, of the Privacy Code.

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<p>announcements of new products, technical assistance activities, etc.); in order to prepare a commercial and marketing communication that is common and coherent with the strategy of the FPZ Group,</p> <p>d) <i>no. 2.</i> – communications to initiate and conduct customer satisfaction surveys on the level of satisfaction with the products purchased and the services provided.</p>	<p>Legitimate interest of the Data Controller to conduct “research” on its Products and Services in order to improve its offer based on the needs of its customers.</p>
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5. PROVISION OF THE REQUESTED DATA AND CONSEQUENCES OF NON-PROVISION

Personal Data must be provided in order to achieve the purposes set out in par. 4, “*Purposes and legal basis for processing Personal Data*”, lett. a) and b). Therefore, if such data is not provided – or provided in part – the activity requested by the Data Subject cannot be performed, the contractual relationship cannot be finalised and the obligations related to the operational, economic and administrative performance of the Services cannot be fulfilled.

6. PROCESSING

Personal Data will be processed by means of manual and computer tools exclusively by authorised and specially trained people.

7. RECIPIENTS/CATEGORIES OF RECIPIENTS OF PERSONAL DATA

7.1. Personal Data may be disclosed to/known by:

- the Data Controller’s staff authorised to process (employees and collaborators);
- third parties providing services to FPZ – Web, e-mail marketing, accounting, administrative, legal, insurance, banking services – who perform part of the processing activities and/or tasks connected to and aimed at the latter on behalf of the Data Controller by virtue of an agreement with the latter;
- the two companies of the Group (Arivent S.r.l. and Doseuro S.r.l.) by virtue of any requests for information that the owner will receive;
- third-party companies and professionals appointed to enforce rights, interests, claims arising from the execution of the Services or in any case from relations with the Data Subjects;
- State Administrations, judicial or administrative Authorities, public and private Entities, also subsequent to inspections and verifications;
- subjects who can access the data under the provisions of law or secondary or community

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legislation.

- 7.2. Such recipients will act, where appropriate, as data processors. Only the category of the recipients is indicated, as it is continuously updated. In order to obtain the updated list of recipients, the Data Subjects can contact the Data Controller directly, by writing to the addresses stated in par. 11.

8. PERSONAL DATA RETENTION PERIODS

The Personal Data will be stored by the Data Controller for the time strictly necessary for the purpose (indicated in paragraph 4 *“Purposes and legal basis for processing Personal Data”*) for which they were collected, and specifically:

- for the purpose stated in par. 4 lett. a): at least for the entire duration of the commercial relationship or provision of the Services or in any case for the time necessary to perform further activities/services in favour of the Data Subjects and, in any case, for a period not exceeding 10 years from the termination of the relationship whereby the Data Controller supplies products and/or services to the Data Subjects;
- for the purpose indicated in par. 4 lett. b): Personal Data whose processing is necessary by virtue of legal obligations, for the entire duration stated in the law;
- for the purpose illustrated in par. 4 lett. d): until the revocation, if any, of the consent given by the Data Subjects or the exercise of the right of objection to which they are entitled, after which such data will be deleted or, in the event that the Services are in progress, data will no longer be processed for this specific purpose (as a consequence, they can be processed, where necessary, for the other purposes that are not based on consent), it being understood that FPZ lawfully processes data until revocation/objection. In the absence of objection, data will be retained as long as the Data Controller provides its Services. Unsubscribing from marketing messages will not interrupt notifications such as updates relating to the provision of the Services. In the absence of revocation or objection, data will be stored as long as the Data Controller performs promotional activities in relation to its business;

In all cases, once the respective terms have elapsed, all Personal Data will be deleted. The terms indicated may be extended in cases where the Personal Data are relevant in relation to pending or foreseeable litigations, due to requests from the competent authorities or pursuant to the applicable legislation.

9. TRANSFER OF PERSONAL DATA TO A THIRD COUNTRY OR TO AN INTERNATIONAL ORGANISATION

Normally, Personal Data are not transferred to Third Countries. Should this become necessary for the fulfilment of the purposes indicated in par. 4, the Personal Data will be transferred in compliance with the provisions of law in force and in the presence of adequate safeguards.

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10. RIGHTS

The Data Subjects, as applicable, may at any time and free of charge exercise the following rights towards the Data Controller:

- **Right of access:** the Data Subjects can obtain from the Data Controller confirmation as to whether or not Personal Data concerning them are being processed and, in this case, obtain access to their personal data;
- **Right to rectification:** the Data Subjects can obtain the rectification/integration of inaccurate/incomplete Personal Data;
- **Right to erasure:** the Data Subjects can obtain, in the cases stated in the regulation, the erasure of their Personal Data;
- **Right to restriction of processing:** the Data Subjects can obtain, in the cases stated in the regulation, restriction of processing of Personal Data (the marking of stored personal data with the aim of limiting their processing in the future).
- **Right to data portability:** the Data Subjects can – if data are processed by automated means based on consent or a contract – receive the personal data concerning them which they have provided to the Controller, in a structured, commonly used and machine-readable format, and transmit those data to another controller.

Furthermore, the Data Subjects have the right:

- **to object** to the processing of Personal Data for the purposes indicated in par. 4, *“Purposes and legal basis for processing Personal Data”*, lett. c) for reasons, to be specified, connected to their particular situation;
- in relation to the processing of their data for the purpose indicated in par. 4 *“Purposes and legal basis for processing Personal Data”*, lett. d), therefore for the management of promotional contacts, to **object** at any time and without giving any reason in the following ways: by clicking on the appropriate link at the bottom of each newsletter received in order to unsubscribe from the mailing list or, as regards the other means of communication, by contacting the Data Controller at the addresses indicated in par. 11;
- finally, if they believe that the processing of their Personal Data breaches the provisions of the GDPR, to **lodge a complaint** with the National supervisory authority of the member state of the European Union where the Data Subjects have their habitual residence or place of work or where the alleged violation of their right has occurred (if that State is Italy, the entity which can be contacted is *Autorità Garante per la Protezione dei Dati Personali*) or to seek **effective judicial remedy** (art. 79 GDPR).

11. CONTACTS

In order to exercise any rights or request information, Data Subjects may contact the Data Controller:

- via mail: Via F.lli Cervi 16 20863 Concorezzo (MB), Italy
- via e-mail: privacy@fpz.com

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