

INFORMATION NOTE ON THE USE OF YOUR PERSONAL DATA

Effective as of 25/05/2018

A DUE di Squeri Donato & C. S.p.A. (hereinafter “A DUE”), is aware of the importance of respecting the privacy of its customers, suppliers, collaborators and visitors to the A DUE websites. For this reason, A DUE undertakes to use personal data received or collected, in compliance with the REGULATION (EU) 2016/679 of the European Parliament (General Data Protection Regulation” – hereinafter “GDPR “).

A DUE, in quality of Controller of the personal data provided voluntarily (i.e. verbally, by means of a business card, via e-mail, fax, ordinary post, PEC, or via the A DUE websites etc.) by its customers, suppliers and other third parties, in relation to the supply of goods and/or services, purchase of goods and/or services, or other forms of collaboration in any case related to the activity carried out by A DUE, hereby brings the present information note to the attention of the above listed natural persons.

You can access the information note following the link www.adue.it/privacy-policy, and it is also available on the A DUE websites, purchase orders, offers and sales contracts, in the footnotes of all ADUE communications via e-mail.

Those who access and use A DUE websites and/or exchange information with A DUE in relation to supply or purchase of goods and/or services, possible employment relationships or other forms of collaboration, confirm that they have read the present information note.

It is understood that this information is not intended for the A DUE employees.

Dear Sirs and Madams, please find here below the information concerning the processing of your personal data performed by A DUE:

1. Identity and contact details of the personal Data Controller (Controller)

A DUE di Squeri Donato & C. S.p.A.

Via Filagni 1/a Collecchio, 43044 (PR)

Commercial Register # 00770380343, VAT ID # IT00770380343

Tel. +39 0521 545011 - Fax. +39 0521 545099

Pec: info@pec.adue.it

Should any clarification, verification or intervention be required you can send a fax, a registered letter or a PEC to the above addresses, indicating in the subject "Privacy request" and you will receive a proper reply within 30 days.

2. Categories of personal data processed

The Data Controller deals with your personal identification data such as: name and surname, tax code, VAT number, residence, domicile, identity documents, images, photos, videos, location of the workplace, e-mail address or PEC, telephone and fax number, employer company, position and/or company classification, bank and payment references etc.

3. Type of processing to which personal data are subjected

The processing of your personal data includes the following operations, performed whether or not by automated means, such as collection, recording, organisation, structuring, updating, storage, adaptation or alteration, retrieval and analysis, consultation, use, disclosure by transmission, alignment or combination, restriction, erasure or destruction.

Occasionally, if you attend such events as fairs, meetings, social engagement or business promotion initiatives, etc. involving also A DUE, your photos or videos can be published on the ADUE websites (www.adue.it; www.lesswaterbevtech.com) or on the A-DUE pages of you-tube (www.youtube.com/channel/UC4ogEHISDCReuzo0-cRWaag) as well as on LinkedIn (www.linkedin.com/company/adue/?originalSubdomain=it), only after having obtained your explicit consent following specific information note.

In any case, the logical and physical security of the data and, in general, the confidentiality of the personal data processed will be guaranteed, by implementing all the necessary technical and organizational measures adequate to guarantee their security.

4. Purposes of personal data processing treatment

The above mentioned personal data will be processed for the following purposes:

- 4.1 to respond to your specific requests for information or assistance regarding the goods/services provided by A DUE (e.g. to process offers and cost estimates addressed to you), to provide A DUE goods and services requested by you (e.g. to manage your purchase orders, your shipments, the sales invoices addressed to you and the relative payments), to purchase from you goods and/or services necessary for the A DUE activity (e.g. requesting you an offer or a quote, assigning an order to you, managing your shipments, invoices and related payments), to receive the necessary information to stipulate with you an employment contract or a collaboration agreement.
- 4.2 to comply with current and future national or international legal obligations, to which A DUE is subject, such as, for example: to comply with the provisions of laws and regulations on customs, accounting, tax, environmental and workplace safety matters; fulfil legal obligations to communicate and report to the authorities; execute an order of judicial authorities or of supervisory bodies to which the Data Controller is subject, exercising in this context the rights of A DUE, in particular, the right of legal defence.
- 4.3 to carry out direct marketing via e-mail for goods and/or services similar to those previously by you requested, used or purchased.

5. Lawfulness of processing and voluntary basis of data processing treatment

The legal basis applied in each individual case depends on the specific purpose of the processing:

- 5.1 The data processing for these purposes is based on the need of A DUE to fulfil pre-contractual and contractual obligations arising from or functional for a contract, of which you (or the company/entity on whose behalf you operate) are a party. Providing personal data for these purposes is mandatory. The lack of data and/or any express refusal to the data processing, will make it impossible for the Data Controller to provide the feedback, the goods and/or services requested by you, purchase your goods and/or services, stipulate with you an employment contract or a collaboration agreement.
- 5.2 The data processing for this purpose is based on the A DUE need to comply with its legal obligations. Providing personal data for these purposes is mandatory and hence it is not possible to withdraw from this kind of data processing, as this could result in a violation of the law by the Data Controller.
- 5.3 The processing for this purpose is based on the A DUE pursuing its legitimate interest: to offer and provide information on its products and services, improve the offered goods and/or services. Providing personal data for these purposes is optional and you can avoid receiving these communications by e-mail immediately or terminate it at any time by writing to the addresses indicated above. Obviously, in this case, you will receive neither newsletters, nor commercial communications and advertising material related to the Services offered by the Data Controller. You will nonetheless continue to be entitled to the Services referred to in point 5.1.

6. Categories of recipients of personal data

A DUE neither sells nor rents your personal data to third parties.

The personal data you provide can be made accessible (exclusively for the purposes referred to in Article 4).:

- 6.1 to employees and collaborators of the Data Controller, in their capacity as internal authorised executor and/or system administrators;
- 6.2 to third parties who carry out *outsourcing* activities on behalf of the Data Controller, in their capacity as external authorised executor (national and foreign);
- 6.3 to judicial or supervisory authorities, administrations, public authorities and bodies, as well as to those subjects to whom the communication is mandatory by law for the accomplishment of the purposes described above. These subjects (national and foreign), will process the data in their capacity as autonomous Data Controllers.
- 6.4 to suppliers, customers or other companies with whom A DUE is collaborating to manage its business. Said subjects (national and foreign) undertake to correctly process the data communicated according to the specific provisions of law (national and foreign).

7. Storage and transfer of the personal data abroad

The management and storage of your personal data is carried out by A DUE in *cloud* environment and on the servers located within the European Union. The transfer of your data abroad to the non-EU countries is performed in compliance with the regulation in force.

8. Personal data storage period

Your personal data will be stored as long as is reasonably necessary for the purposes indicated above, in accordance with applicable laws. In particular:

- 8.1 for the purposes referred to in Article 4.1, legal basis 5.1, the Data Controller will process personal data for the necessary time, in order to fulfil these purposes, however for no more than 10 years from the termination of the relationship.
- 8.2 for the purposes referred to in Article 4.2, legal basis 5.2, the storage time of personal data is 10 years, with the exceptions provided for by applicable rule, including, for example, art. 2946 of Italian Civil Code.
- 8.3 for the marketing purposes referred to in Article 4.3, legal basis 5.3, personal data will be kept until your eventual opposition.

9. Rights exercisable

At any time you can assert your right to ask A DUE the access to your personal data, rectification or cancellation, the portability of the same, the limitation of treatment. You can also oppose the processing of your personal data. Your rights in detail are listed below:

- 9.1 Right of access** – to access your personal data (or a copy of such personal data), as well as further information on the treatments in progress on them;
- 9.2 Right to rectification** – to obtain the correction of your inaccurate personal data and the update of incomplete personal data;
- 9.3 Right to erasure** – to obtain the cancellation of your personal data (Article 17 GDPR);
- 9.4 Right to restriction** - to obtain the restriction of processing, in the cases provided for by regulation (Article 18 of the GDPR);
- 9.5 Right to data portability** – to obtain, in a structured, commonly used and machine-readable format your personal data provided to A DUE, as well as obtaining that the same are transmitted to another Data Controller without impediments, in the cases provided for by the regulation;
- 9.6 Right to object** – to object to the processing of your personal data, unless there are legitimate reasons for the Data Controller to continue processing, and with the consequences referred to in the point 5). In particular, you can oppose the use by A DUE of the legitimate interest for the purposes of Marketing.

You can exercise these rights simply by sending a request by fax, registered letter or PEC to the Data Controller at the addresses referred to in the point 1.

You also have the right to lodge a complaint with the competent Supervisory Authority (in Italy named “Garante per la Protezione dei dati personali”), if you believe that the processing of your personal data is contrary to the regulation in force (art.77 GDPR).

10. Focus on personal data provided by A DUE website visitors

10.1 Information provided by the user

A DUE collects, stores and processes the personal data, which you enter on A DUE sites as users, for example, when you fill out the contact data collection form, or you spontaneously propose yourself for a working collaboration. Such data may include:

- a) Contact information such as name, address, telephone number, e-mail address, company for which information is requested, attachments, if any;
- b) Information relating to employment, education and other similar data, any attachments (e.g. the Curriculum Vitae), in case such data are requested or proposed (spontaneous application), in relation to possible searches and selection of personnel at A DUE.

If you communicate or request information from A DUE through the website, you may be asked to provide the Personal Data necessary to process your request, with subsequent data processing.

10.2. Information that can be acquired automatically

In order to personalize, improve your web-surfing and/or to better understand, improve marketing campaigns and the content of A DUE websites, when you use a A DUE website, a certain information about the way you use it and your device is acquired automatically, as described below:

- a. IP address: when you visit the A DUE Spa web-sites, your IP address is not registered for statistical purposes since the anonymous statistical storage of Google Analytics has been enabled.
- b. b. monitoring technologies (Cookies): the details related to the A DUE websites utilization are collected, with the consent always revocable, also by means of monitoring technologies such as cookies (a "cookie" is a unique numeric code that is transferred, with prior consent, in your computer to monitor your interests and preferences and to recognize you as a regular visitor). For more information on cookies and other monitoring technologies, as well as how to disable them, visit <http://www.allaboutcookies.org/>. Please note that some cookies are essential for the correct operation of the websites and deleting or disabling them will reduce the functionality of the A DUE websites.
- c. Monitoring on mobile devices: if you access the A DUE websites via a mobile device, in addition to the other information previously described, indications regarding the mobile device can be collected such as, type of device, type of hardware, Media Access Control Address ("MAC"), International Mobile Equipment Identity ("IMEI"), the operating system version of your mobile device, the platform used to access the A DUE website, or to download from it (for example, Apple, Google, Amazon, Windows), location information, information on the use of your device and your browsing on the A DUE websites, always specifying that your address is anonymized, therefore not transmitted to third parties.

10.3 Personal data storage

The data treatments related to the Web services on this website are performed at the Aruba provider where the server is located. They are handled only by employees, collaborators or persons entitled by the Data Controller for the treatment, or by the persons in charge of maintenance. The data can also be viewed by the company that manages the website with the purpose of server and the website maintenance and however, limited to technical access only. An encrypted Backup of the Data Base is performed at the DropBox Cloud.

10.4 Remarks

This Privacy Policy does not apply to third-party websites to which you are redirected via links available on the A DUE websites.

The You-tube and LinkedIn pages reporting information, photos and videos relating to A DUE, are managed directly by A DUE, in compliance with this information note, only with regard to the contents publication.

The privacy policies of YouTube and LinkedIn are available respectively at:

https://support.google.com/youtube/answer/7671399?p=privacy_guidelines&hl=en-GB&visit_id=0-636626548594902098-1530659840&rd=1e and https://www.linkedin.com/legal/privacy-policy?_l=en_EN

11. Amendments to the Privacy Policy

It is possible that the present information note can be amended or updated, in compliance with regulation in force. The changes will be published on the site with the relevant effective date.

12. Reference Regulation

The complete reference document, i.e. the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT (General Data Protection Regulation "- GDPR) is available at the link <http://www.privacy-regulation.eu/en/index.htm> .

A DUE S.p.A.

Simone Squeri