

Customer Data Protection Policy

Pursuant Art. 13 of the EU Regulation 679/2016 (hereinafter also only "GDPR") Caldara Precision Tool srl, as better identified below, as the "Data Controller" or "CALDARA" or "Company", provides you with the following information regarding the processing of personal data (i.e. any information concerning an identified or identifiable natural person) provided by you. In accordance with the regulations indicated, this process will be based on the principles of correctness, lawfulness, transparency and protection of your privacy and rights.

Personal Data controller

The personal data controller is:

Caldara Precision Tools srl
Via Geret al Lambro, 21
22037 Ponte Lambro (CO)

represented by the persons entitled to sign in accordance with the entries in the Chamber of Commerce of Como (IT03621050131).

The list of Data Processors and any authorized persons appointed is kept at the Data Controller's premises and made available at the request of the data subject.

Definitions

Pursuant to Article 4 of the Regulation (UE) n. 679/2016 – GDPR, we refer to the following definitions:

- **Personal data:** any information relating to an identified or identifiable natural person;
- **Data subject:** any individual person who can be identified directly or indirectly;
- **Processing:** any operation (or set of operations) which is performed on personal data. It may be the collection, recording, organization, storage, adaptation or alteration, consultation, use, disclosure by transmission, restriction, erasure or destruction;
- **Communication:** the transmission of personal data or making them accessible;
- **Data controller:** the private person or federal body who, alone or jointly with others, determines the purpose and the means of processing personal data
- **Data processor:** the private individual or the federal body processing personal data on behalf of the controller.

Personal data being processed

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, payment details and information about your access to our website.

We may collect personal data from you when you request or make a quote, participate in a survey or competition or when you contact us.

- a. The Company especially may process (by way of example but not limited to) the following personal data: Personal, identification, and contact data (such as name, address, e-mail address, telephone number,);
- b. Company name where it contains personal data and identification data of the legal representative;
- c. Common data of employees and/or collaborators and/or consultants;
- d. Professional situation of the data subject;
- e. Administrative and accounting data for any payments (e.g. IBAN, account number, credit card or other payment details and in general the information needed to make payments and invoicing), tax domicile, other documents and tax information;

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- f. Images and audio video footage;
- g. The communications you exchange with us or direct to us via letters, emails, calls, and social media.

The Company undertakes to keep the personal data of the persons concerned correct and up-to-date. Therefore, should your personal data change, please inform us of the change as soon as possible. Personal data are collected directly by the data subject.

Purpose of processing

The Company may process your personal data for the following specific purposes:

- a. Completion, execution and possible termination of the contract for the supply of goods and services and in particular for:
 - executing the contract, including the acquisition of information prior to its conclusion and filling in the customer file for the initiation of the business relationship;
 - carrying out the fulfilments related to the management of payments and related invoicing, including the forwarding of accounting documents;
 - processing orders and shipments, delivering products, providing after-sales service;
 - managing and carrying out the necessary customs formalities in the case of import/export activities (including storage in its own customs warehouses and assistance in inspections by the relevant authorities);
 - carrying out the services of transport, logistics and management of goods shipments, storage of the goods entrusted in the event of a stoppage, execution of all the paperwork necessary for the correct and complete management of the shipment and/or goods in transit;
 - collect, register, handle and process any complaints;
 - identify the needs of the persons concerned in order to offer appropriate solutions and to perform the services asked;
 - contacting you to receive a feed-back about our quote, product or service;
 - to manage our relationship with you as our customer and to improve our services and enhance your experience with us;
- b. To fulfil any administrative tasks and in particular to:
 - manage the relationships established;
 - performing a service or one or more agreed transactions;
 - meet operational or management needs (including correspondence with the data subject and phone calls);
 - provide news, information and assistance related to the activity performed;
 - collect, record, edit and manage customer master data;
 - perform the tasks related to the management of payments, for accounting, billing audit purposes;
- c. To fulfil legal, tax or regulatory obligations related to the management of the relationship established;
- d. For sending you information regarding new products or promotions via e-communications (newsletter);
- e. For statistical and marketing analysis;
- f. To ensure IT security and IT functionality as well as SW and HW IT maintenance;
- g. For outsourcing functions and services to service providers and auxiliaries contracted by the same;
- h. To implement security measures for buildings and installations;
- i. For the transfer of the data subject's personal data to third companies in connection with the sale of a company or business unit, acquisitions, mergers or demergers;

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- j. collect, publication, and/or sharing on the Company's institutional website or corporate social networks of images and/or audio video footage of the person concerned;
- k. Assert rights in judicial, extrajudicial or administrative proceedings and exercise the right of defence in legal disputes;
- l. Manage fulfilments related to financial organisation as well as reporting and controlling, and specifically for corporate compliance, risk management, audit and due diligence, and/or crime prevention, detection and investigation.

Legal basis and justified reason

Pursuant to GDPR, the Controller processes your personal data within the applicable legal framework. Where required, and depending on the purpose of the processing activity, the processing of your personal data may be based on one of the following legal bases/reasons:

- a. for processing relating to the completion and performance of the contract and administrative tasks: overriding interest of the Data Controller, sub specie performance of the contract;
- m. for the fulfilment of regulatory obligations related to contract management: the need to fulfil a legal or regulatory obligation;
- n. for sending you information regarding new products or promotions via e-communications (newsletter); for statistical and marketing analysis; for the collection, publication, and/or sharing on the Company's institutional website or corporate social networks of images of the person concerned: consent of the data;
- o. to ensure IT security and IT functionality as well as SW and HW IT maintenance;
- p. for outsourcing functions and services to service providers and auxiliaries contracted by the same;
- q. to implement security measures for buildings and installations;
- r. for the transfer of the data subject's personal data to third companies in connection with the sale of a company or business unit, acquisitions, mergers or demergers;
- s. assert rights in judicial, extrajudicial or administrative proceedings and exercise the right of defense in legal disputes;
- t. manage fulfilments related to financial organization as well as reporting and controlling, and specifically for corporate compliance, risk management, audit and due diligence, and/or crime prevention, detection and investigation: overriding interest of the Data Controller/legitimate interest of the Data Controller

The communication of personal data is necessary for the conclusion and execution of the contract as well as to fulfil legal obligations, and therefore, any refusal to provide them in whole or in part may result in the impossibility for the Company to execute the contract.

The processing of your personal data for sending you information regarding new products or promotions via e-communications, for statistical and marketing analysis such as for the collection, publication, and/or sharing on the Company's institutional website or corporate social networks of images of the person concerned may only take place on the basis of your specific and distinct consent. Failure to give your consent for such purposes shall have the sole consequence of preventing the processing of your personal data by the Controller for the aforementioned Purposes.

Where the legal basis of the processing is the legitimate interest of the Controller, the Controller guarantees that it has previously carried out an assessment ('balancing test') aimed at ensuring the proportionality of the processing so that the rights and freedoms of the Data Subjects are not adversely affected, taking into account the reasonable expectations of the Data Subjects in relation to the specific processing activity performed.

In the event that the Company intends to use your personal data for any other purpose incompatible with the Purposes for which it was originally collected or authorized, the Company will inform you in advance and, where required, request your consent for such processing activity.

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Modalities of personal data processing

Personal data will be processed by manual, computerized and telematic means.

Data may be collected, registered, stored, used, modified, communicated, archived, cancelled or destroyed using instruments and procedures that guarantee security and confidentiality.

The data will be entered in the records and registers required by law and will be forwarded to social security and financial institutions in accordance with the law for employers.

Personal data will not be processed by fully automated means, including profiling.

Conservation period

We will not retain your data for longer than is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means. We must also consider periods for which we might need to retain personal data in order to meet our legal obligations or to deal with complaints, queries and to protect our legal rights in the event of a claim being made.

Your personal data will be stored in accordance with the provisions GDPR, where applicable, on the basis of the principle of necessity of processing and especially:

- for the entire duration of the contractual relationship and, after the termination of the contractual relationship, for a period not exceeding 10 years (except for the receipt of acts interrupting the statute of limitations or the existence of the prerequisites for the suspension of the statute of limitations; or the specific agreement of a different retention period between the parties; or, in any case, for the different period provided for by law - for the proof of the fulfilment of legal or tax obligations or that necessary to enable the Company to possibly protect its rights in judicial or administrative proceedings or in any case before a Public Authority);
- until revocation of consent by the data subject, with regard to personal data processed with the consent of the data subject (for sending you information regarding new products or promotions via e-communications; for statistical and marketing analysis; for the collection, publication, and/or sharing on the Company's institutional website or corporate social networks of images of the person concerned) it being understood that revocation of consent shall not affect the lawfulness of processing carried out on the basis of consent given before revocation;
- in accordance with the terms that may be provided for by specific regulations on the retention of data and documentation (cf. both tax and commercial law) in order to comply with regulatory and/or post-contractual obligations and/or to protect the legitimate interests of the data subject, to comply with legal obligations.

In any case, the data will be retained for the duration of the extrajudicial and/or judicial proceedings, until the time limit for judicial remedies and/or appeals is exhausted.

We will also consider if and how we can minimize over time the personal data that we use, and if we can anonymize your personal data so that it can no longer be associated with you or identify you, in which case we may use that information without further notice to you.

Subsequently, once the aforementioned reasons for processing have ceased to exist, the Data shall be deleted, destroyed or simply kept anonymous unless there are further legitimate interests of the Data Controller and/or legal obligations that make it necessary, after minimization, to keep them.

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Security Measures

All Company personnel who have access to personal data are required to comply with internal rules and procedures concerning the processing of personal data in order to protect them and guarantee their confidentiality. The Controller has also implemented appropriate technical and organizational measures to protect personal data against destruction, loss, modification, misuse, disclosure or unauthorized, accidental or unlawful access, as well as against all other unlawful forms of processing.

The data you provide to us is protected using SSL (Secure Socket Layer) technology. SSL is the industry standard method of encrypting personal information and credit card details so that they can be securely transferred over the Internet.

Target audience

Your personal data may be communicated, where necessary, to:

- Data Processors;
- Natural persons acting under the authority of the Data Controller and the Data Processor for the purposes set out above;
- Parties that have the right to access your data due to legal provisions, secondary or EU regulations;
- Competent authorities for the fulfilment of legal obligations and/or provisions of public bodies upon request;
- Custom authorities;
- Trusted service providers we are using to run our business such as forwarder and express couriers, cloud service and e-mail marketing service providers assisting our marketing team with running customer surveys and providing targeted marketing campaigns;
- Credit card companies which facilitate your payments to us, and anti-fraud screening, which may need information about your method of payment
- Legal and other professional advisers, law courts and law enforcement bodies in all countries we operate in order to enforce our legal rights in relation to our contract with you;
- Representative in the European Union for Data Protection;
- Personal Data Protection Officer where appointed.

Where the Data Controller transfers your data to third-party service providers, the Data Controller shall ensure that they meet the same security standards.

Third-party service providers are therefore required to comply with a number of technical and organizational security measures, regardless of their location, including measures relating to: (i) information security management; (ii) information security risk assessment; and (iii) information security measures (e.g. physical access controls, logical access controls; malware and hacking protection; data encryption measures; backup and recovery management measures). The third parties described above must process the personal data shared under this provision in accordance with the purpose for which such data was originally collected and at least to the same level of protection as in Switzerland.

The list of Data Processors is constantly updated and available at the Data Controller's head office.

Communication of data outside the European Union

Your personal data, processed for the purposes set out in Article 4, will be kept in Italy or Switzerland and will not be transferred to third countries that do not have the same data protection laws as the country where the information was originally provided, without the consent of the person concerned.

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In view of this, the Holder has taken steps:

- by expressly requesting that Microsoft's M365 servers be located in Europe;
- that the transfer of the personal data of the persons concerned to third countries (Switzerland) only takes place in compliance with GDPR, i.e. a country ensuring adequate protection

Your personal data will not be subject to dissemination or to any fully automated decision-making process, including profiling.

Rights of the data subject

In accordance with the GDPR, the Data Controller recognizes in particular the following rights (non-exhaustive list):

- to be subject to transparent processing (Art. 12 GDPR);
- to obtain confirmation as to whether or not personal data is being processed and, if so, to obtain access to the personal data - including a copy thereof - and communication of, among others, the following information: purpose of the processing, categories of personal data processed, recipients to whom the data has been or will be communicated, period of data retention, (right of access - Article 15 GDPR)
- obtain, without undue delay, the rectification of inaccurate personal data and/or the supplementation of incomplete personal data (right of rectification – Article 16 GDPR)
- to obtain, without undue delay, the erasure of personal data (right to erasure - Article 17 GDPR)
- receive, in a structured, commonly used and machine-readable format, personal data where the processing is based on consent and is carried out by automated means (right to data portability - Article 20 GDPR);
- object to the processing at any time, for reasons related to their situation (right to object - Article 21 GDPR). If this right is exercised, the Company will refrain from further processing of personal data, provided that there are no compelling legitimate grounds to proceed with the processing anyway;
- obtain the restriction of processing (right to restriction of processing) where the accuracy of personal data is contested (for the period necessary for the Data Controller to verify the accuracy of the personal data) or where the data subject has objected to the processing (pending verification as to whether the Data Controller's legitimate reasons prevail over those of the data subject) (Art. 18 GDPR)
- to obtain the possibility of asserting one's point of view with respect to automated decisions and in particular that of demanding a review of the decision by a human being (right not to be subject to an automated individual decision - Art. 22 GDPR)
- to lodge a complaint with the competent supervisory authority;
- if neither the correctness nor the inaccuracy of the personal data can be proven, request that a note be added to indicate the dispute;
- request that the rectification, destruction, blocking, especially communication to third parties, in addition to the note on the objection or ruling be communicated to third parties or published;
- have the processing of personal data declared unlawful.

The data subject may exercise his or her rights in the following ways:

- **by e-mail:** sending a request to the Company to the following e-mail address: privacy@caldaraprecisiontools.com
- **by post:** Caldara Precision Tools srl, Via Geret al Lambro 21, 22037 Ponte Lambro (CO)

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When contacting the Data Controller, you should make sure to include your name, e-mail address, postal address and/or telephone number(s) to ensure that the Data Controller can handle your request correctly.

The Company will comply with such requests, revocations or objections as required by applicable data protection regulations at the latest within one month of receipt of the request. This deadline may be extended depending on the complexity or number of requests and the Company will explain to you the reason for the extension.

Privacy contact person

The Company has appointed a Privacy Contact who can be contacted at the Data Controller's address indicated above or by sending an email to privacy@caldaraprecisiontools.com

Updating this policy

The Controller reserves the right to change, update, add or remove parts of this privacy policy at its own discretion and at any time.

Effective Date, 28.03.2025