	<p style="text-align: center;"><b>PRIVACY POLICY</b></p> <p style="text-align: center;"><b>Art. 13 and 14 of REGULATION (EU) 2016/679</b></p> <p style="text-align: center;"><b>CUSTOMER</b></p>	<p>MDC.17 Rev. 0 01/09/2021</p> <p>Page <b>1</b> / <b>4</b></p>
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E80 Group S.p.A (hereinafter also only referred to as "E80" or "the Company") in its capacity as Data Controller, asks you to carefully read this policy, prepared pursuant to European Regulation No. 679/2016 on the protection of personal data ("Regulation") as well as the Video Surveillance Measure of 08/04/2010 of the Italian Data Protection Authority and the EDPB Guidelines of July 2019.

### **Nature of the personal data**

We inform you that the data requested by E80 Group S.p.A. (First Name, Surname, Company Name, tax details, contact details and bank details) will be processed in accordance with national and European legislation including any measures issued by the Supervisory Authority (for Italy, "Garante per la protezione dei dati personali") where applicable.

### **Purposes of processing**

Your personal data will be processed exclusively for purposes related to the establishment, management and execution of the contractual relationship, including but not limited to the fulfilment of legal and regulatory obligations (e.g. tax obligations, accounting obligations, obligations arising from occupational health and safety regulations), administrative management of contracts, including the management of payments and invoices; management of any litigation; management of data within the Customer's data base; issuance of any other documentation (institutional communications, summaries and processing expressly requested by the Customer); selection in relation to reciprocal requirements, as well as for the purposes of group reporting, internal controls (security, quality of services, asset integrity), management control, certification.

The provision of personal data for such purposes is mandatory as it is necessary to allow compliance with legal and contractual obligations, with the consequence that any refusal to provide such data will not allow the execution and management of the existing contractual and business relationship with the Data Controller.

### **Legal basis for processing**

The processing of personal data for the above-mentioned purposes is not subject to the consent of the Data Subject but is justified by the existing contractual relationship (Art. 6 par.1, letter b GDPR), by the legitimate interest of the Data Controller (Art. 6, letter f), as well as by the compliance with legal obligations by the Data Controller (Art. 6 par. 1, letter c GDPR).



**E80 Group S.p.A.**

Subject to direction and coordination by Eagle Srl  
Registered office in Via G. Marconi, 21 - 42030 Viano (RE), Italy  
Ph. (+39) 0522 762011 - Fax (+39) 0522 988481 - E-mail: [info@e80group.com](mailto:info@e80group.com) - PEC: [e80group@pec.it](mailto:e80group@pec.it)  
[www.e80group.com](http://www.e80group.com) - Fully Paid-up Share Capital € 1.061.818 - Company Registration Number: RE - 227884  
ATECO Code 28.99.20 - VAT Number IT01835150358

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## **Video surveillance**

We inform you that a video surveillance system has been activated on all company access areas and in all perimeter areas with the sole purpose of protecting people and property from third parties, protecting company assets and preventing vandalism or theft. All areas in which video surveillance or video recording systems are installed are identified by means of signs, also posting the short version of the privacy policy.

With reference to the images recorded by the video surveillance system active at the company premises, present in the areas specifically indicated by appropriate signs, we inform you that:

- The images will be recorded and processed lawfully for the purpose of protecting company assets;
- The video surveillance system is equipped with cameras connected to a recording system;
- Only authorised internal staff may access the recorded images.

## **Data processing methods**

Personal data will be processed by the Company and its employees within our records and stored on our databases and processed both using electronic and/or paper means in accordance with the principles of the law and protecting the confidentiality of the Data Subject and their rights by adopting suitable technical and organisational measures to ensure a level of security appropriate to the risk.

## **Communication, dissemination and transfer of data**


The aforementioned personal data may be disclosed, solely for the above-mentioned purposes, to specific third parties (also abroad), including, legal and accounting consultants, banks, transport service providers, associated, subsidiary and parent companies, within the limits established by the aforementioned data processing purposes or for internal organisation reasons. These parties act on the basis of the instructions of the Company, as data processors on the basis of contractual agreements. Other parties may become aware of your personal data in their capacity as data processors or persons in charge of processing, such as our employees, who are assigned the tasks necessary for the performance of the contract signed by you, as well as data processors appointed by the Company and appointed on the basis of the agreement concerning the processing of personal data.

Without prejudice to communications carried out in fulfilment of legal obligations, the personal data provided will not be disclosed to third parties or disseminated.



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No transfer of collected personal data in non-EU countries is foreseen. The servers are currently located in Italy. Data will not be transferred outside the European Union. It is in any event understood that, should it become necessary to move the location of the servers, in Italy and/or to the European Union and/or non-EU countries, such a move will always take place in compliance with Art. 45 et seq. of the GDPR. In this case, however, the Data Controller hereby ensures that the transfer of data outside the EU will be carried out in accordance with the applicable legal provisions by concluding, if necessary, agreements guaranteeing an adequate level of protection and/or by adopting the standard contractual clauses provided for by the European Commission.

### **Data Retention**

The personal data you have provided us with will be processed by the Data Controller for the duration of your contractual relationship with E80 Group S.p.A., after which they will be retained solely for the purpose of complying with the relevant legal obligations, for administrative purposes and/or to assert or defend a right, in the event of litigation and pre-litigation.

We also inform you that, in accordance with articles 5 and 89.1 of the Regulation, your personal data may be stored for longer periods of time than specified in the previous paragraph [for statistical purposes only], subject to the implementation of appropriate technical and organisational measures required by law to protect your rights and freedoms.

In any event, the Data Controller will process personal data for the time strictly necessary to fulfil the above-mentioned purposes, in compliance with the principles of minimisation and limitation of storage under Art. 5(1)(c),(e) GDPR. With this in mind, the Data Controller shall delete the images collected through the video surveillance system seven days after the recording.

### **Rights of the Data Subject**

As a Data Subject, you are entitled to exercise the rights provided for in articles 15, 16, 17, 18, 20, 21, and 22 of the GDPR by addressing your requests to the following reference address: [privacy@e80group.com](mailto:privacy@e80group.com)

In particular, pursuant to Art. 13(2)(b) GDPR, the following rights may be exercised in relation to the processing of personal data in question, in order to ensure correct and transparent processing:

- **Right of information and access (pursuant to Art. 15 GDPR):** the right to obtain from the Data Controller information on the existence or otherwise of data processing concerning you, as well as



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access to your personal data and information on the purposes of processing, the recipients or categories of recipients to whom the data are disclosed.

- **Right to rectification (pursuant to Art. 16 GDPR), erasure (pursuant to Art. 17 GDPR) and restriction (pursuant to Art. 18 GDPR):** the right to request from the Data Controller the rectification and erasure of your personal data and the restriction of processing.
- **Right to data portability (pursuant to Art. 20 GDPR):** the right to receive the personal data concerning you provided to the Data Controller in a structured, commonly used and machine-readable format and the right to transmit such data to another data controller, provided that this operation is technically feasible.
- **Right to object (pursuant to Art. 21 GDPR):** the right to object to the processing of your data.

Furthermore, we inform you that you have the right to lodge a complaint with the Italian supervisory authority: "Garante per la Protezione dei Dati Personali" if you consider that your rights have been violated by the Data Controller and/or a third party.

#### **Data Controller**

The Data Controller of the personal data processing is E80 Group S.p.A., with registered office in Via G. Marconi, 21 - 42030 Viano Reggio Emilia.

#### **Viano (Reggio Emilia, Italy) E80 Group SpA**

**Signature** \_\_\_\_\_

**in acknowledgement: the Data Subject**



**E80 Group S.p.A.**

Direzione e coordinamento: Eagle S.r.l.

Sede legale in Via G. Marconi, 21 - 42030 Viano (RE), Italia

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Capitale Sociale € 1.061.818 i.v. - R.E.A. della C.C.I.A.A. di Reggio Emilia n. 227884 - Codice Ateco 28.99.20

Codice Fiscale e Registro delle Imprese di Reggio Emilia IT01835150358