

INFORMATION NOTICE ABOUT PERSONAL DATA PROCESSING PURSUANT TO ARTICLE 13 OF THE GDPR 2016/679

Arconvert S.A., owner of the website, would like to inform you about the way in which the website is managed regarding data processing and the protection of persons (users concerned) who browse the website.

This document represents an information notice pursuant to the provisions in Article 13 of the European Regulation number 679 of 27 April 2016 (hereinafter referred to as the "GDPR") and it is solely and exclusively valid for the website belonging to the Company and not for other websites that the user may visit via the links contained therein. We would like to point out that the "Ask Arconvert" service is rendered by the legal entity Arconvert S.A. (España), which is the controller for this specific data. Therefore, please consult the corresponding information notice.

1. The Data Controller

The Data Controller is **Arconvert S.A.**, with registered office at Carretera de Cartellà, nº 6; 17150 - Sant Gregori (Girona) Spain, C.I.F. ESA17001801A.

For the purpose of exercising the rights stipulated in the Regulation and for any query you may have regarding your personal data, you can contact the Data Controller by sending a message to the following email address: gdpr@arconvert.es

2. Purpose and legal basis of the data processing

The legal basis of the processing described in this information notice is that specified in Article 6, point a) of the European Regulation: *"the data subject has given consent to the processing of his or her personal data for one or more specific purposes"*.

The purposes of the data processing are as follows:

"Contact form" section

- a) The data are collected and processed in order to reply to Users' requests for information;
- b) The data are collected and processed in order to send informative and promotional material and/or commercial messages related to new products or updates and news about existing products and/or promotional events organised by Arconvert S.A., including sending newsletters; to conduct market surveys.

3. Type of personal data processed

Data provided by the user

Within the scope of the various aforementioned purposes, the following data will be processed:

Contact form: Full name, name of the company the user belongs to, business position, email address, telephone number, address of the user (street, city, post code, province and country);

Data that we collect automatically

During their normal operation, the IT systems and software procedures used for the functioning of the Website collect certain data, the transfer of which is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subjects, but due to its nature, it could lead to users being identified through processing of and association with data held by third parties. IP addresses or domain names of the computers and the terminals used by users, the URI/URL addresses (Uniform Resource Identifier/Locator) of the



requested resources, the time of the request, the method used to send the request to the server, the size of the reply file obtained, the numeric code that indicates the status of the reply provided by the server (processed correctly, error, etc.) and other parameters related to the operating system and the IT environment of the user are included in this data category. These data are only used to collect anonymous statistical information about the use of the Website and to monitor its proper functioning. The data could be used to assign liability in alleged cyber-crimes against the website or other users, only at the request of the responsible supervisory bodies.

4. Data processing methods

The collected data are processed solely by authorised parties using automated and non-automated tools and appropriate methods to ensure the security and confidentiality thereof, and they are processed for the time required to achieve the purposes for which they were collected.

5. Possible recipients or categories of recipients of the personal data

The personal data held by Arconvert S.A. shall not be disseminated. They may be disclosed within the Company, transferred to duly authorised persons, and disclosed, if necessary, to the companies belonging to the Fedrigoni Group, to which Arconvert S.A. belongs, solely for the purposes specified in this information notice.

Moreover, solely for the purposes object of this information notice, the data may be disclosed to technical service providers, accommodation providers, IT companies and communication agencies, which will also be appointed as Data Processors by the Controller, if necessary. The updated list of Data Processors can be requested at any time from the Data Controller.

6. Transfer of personal data to other countries

Arconvert S.A. does not intend to transfer your personal data to countries outside the European Union.

In any case, if this occurs, Arconvert S.A. guarantees that this transfer will be made:

- To companies that form part of the Fedrigoni Group that adopt the same procedures regarding personal data processing (Corporate Binding Rules approved by the competent Supervisory Authority, or standard clauses pursuant to Article 46 of the GDPR);
- To countries outside the EU that, according to the European Commission, ensure an adequate level of protection (Article 45 of the GDPR) or have previously adopted the mechanisms specified in Article 46 of the GDPR;
- With the data subject's prior consent when this is permitted by law (Article 49, point a) of the GDPR).

The foregoing may only be derogated in the situations stipulated in Article 49 of the GDPR.

7. Term for storing the personal data

Contact form:

The personal data processed to reply to Users' requests for information will be stored for the time required to provide a reply and, in any case, up to a maximum term of three months after the request is made.

The personal data processed for marketing purposes will be stored for 36 months from the date consent is granted. Once this term expires, unless contractual relations have been established with the company to which the data subject belongs, the request for consent shall be renewed, if necessary.

The data may be kept for a longer period of time due to petitions received from the Public



Authorities or another judicial, government or regulatory body or due to the company that has drawn up these information notices being involved in legal proceedings that imply processing the personal data provided by you.

8. Mandatory and optional nature of providing data

Providing your personal data is optional. Failure to provide the data or refusal to grant consent for the purposes outlined in point a) will prevent Arconvert S.A. from replying to the User's requests. Failure to provide the data or refusal to grant consent for the purposes outlined in point b) will prevent Arconvert S.A. from carrying out the specified activities with such purpose. Refusal to grant consent for the purposes outlined in point b) will not prevent the purpose in point a) from being carried out.

9. Rights of the data subject

The data subject shall have the right to obtain access to the personal data from the data controller. In particular, the data subject has the right to obtain the following: a) information about the source of the personal data, the purposes and methods of the processing, the logic involved if processing is carried out using electronic tools; b) the rectification or update of data; c) the erasure of data or the restriction of data processing (making them anonymous, blocking data that were processed in breach of the law, including data that do not need to be stored for the purposes for which they were collected and subsequently processed); d) the portability of processed data in a structured manner. In any case, the data subject is entitled to revoke the consent granted to process personal data. However, revoking the consent granted for data processing shall not affect the legality of the processing that was carried out based on the consent granted prior to such revocation.

A data subject resident in Spain is entitled to file a claim with the Supervisory Authority, represented in Spain by the Spanish Data Protection Authority, with registered office at C/ Jorge Juan, 6. 28001 - Madrid. Any data subject who resides outside of Spain may file a claim with the Supervisory Authority appointed in their country of residence.

In any case, we would like to inform you that pursuant to Article 21 of the European Regulation 2016/679, if the data are processed for direct marketing purposes, you are entitled to object to the processing of your personal data for such purpose at any time.

10. Non-existence of an automated decision-making process

Arconvert S.A. does not subject the data processing object of this information notice to automated decision-making processes.

11. Interaction with social media and external platforms

This kind of service allows users to directly interact with social media, or other external platforms, from the pages on this Website. The interactions and information collected by this Website are in any case subject to the User's privacy settings for each social network. If a social media interaction service is installed on the latter, it is possible that it could collect traffic data related to the pages on which it is installed, even if users do not use the service.

The social networks identified are Facebook, Twitter, Instagram, LinkedIn and YouTube. Please consult the relevant information notices and privacy policies of each of the aforementioned social networks.

**Request for consent**

The undersigned specifically consents to the processing of his/her personal data pursuant to Article 6, point a) of the European Regulation number 2016/679 in order to enable Arconvert to process and reply to the request for information sent

I consent

I do not consent

The undersigned specifically consents to the processing of his/her personal data pursuant to Article 6 point a) of the European Regulation number 2016/679 and in accordance with the Guidelines on promotional activity and prevention of spam of the Italian Data Protection Authority of 4 July 2013 for marketing purposes (sending informative and promotional material and/or commercial messages related to new products or updates and news about existing products and/or promotional events organised by Arconvert S.A.), including sending newsletters

I consent

I do not consent