

**PRIVACY STATEMENT for the processing of personal data Art.13. REGULATION (EU) 2016/679**  
**(Privacy policy on personal data - Customers - INF. 1 W – Rev. 4 of 20/02/2025)**

Data Controller: **Stiferite S.p.A.** – Via della Navigazione Interna, 54 int. 5 – 35129 Padua (PD)/IT

**RE:** Privacy Statement pursuant to and in accordance with Articles 7, 8, 9, 12, **13**, 14 and 15-22 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

**1. PROCESSING (how we process your personal data)**

**Stiferite S.p.A.**, or Data Controller, in the person of its Legal Representative, informs you that, in order to ensure the effective management of the contractual relationship, it may process the CUSTOMER's data (also known as the "data subject", understood as the individual who requested a quote or a service from the Data Controller, or is entering or has previously entered into a contract with the Data Controller or, in any case, has requested to enter into a contract), pursuant to Regulation (EU) 2016/679, Legislative Decree 196/2003 as further amended and extended as well as any related regulations, for the purposes outlined below.

INTENT (why)	LEGAL BASIS (on what assumptions)	CONSEQUENCES OF YOUR REFUSAL TO PROVIDE THE DATA	PROCESSING DURATION (for how long)
Correct and complete performance of the contract, and execution of pre-contractual measures requested by the data subject.	Fulfilment of obligations arising from pre-contractual measures requested by the data subject or the existing contract	Contractually mandatory provision: without your data it will not be possible to enter into or perform the contract and fulfil the requirements of the data subject	Up to 10 years after the termination of the contractual relationship or of the pre-contractual requirements
Fulfilment of legal or regulatory requirements, for administrative and accounting purposes relating to the performance of the contract	Fulfilment of legal obligations arising from current legislation	Legally mandatory provision: without your data it will not be possible to enter into or perform the contract and fulfil the requirements of the data subject	Up to 10 years after the termination of the contractual relationship or of the pre-contractual requirements
Establishing, exercising or defending a right in court or whenever the judicial authorities exercise their judicial functions.	The Data Controller's legitimate interest, which shall be deemed to take precedence pursuant to Recital 21 of the GDPR for the legitimate legal protection of its own rights	Refusal to provide data will make it impossible for the Data Controller to establish, exercise or defend a right in court.	Up to 10 years after the termination of the contractual relationship or of the pre-contractual requirements
Fraud prevention and protection of communication networks or computer systems (when the customer has access to the Data Controller's systems or networks)	The Data Controller's legitimate interest, which shall be deemed to take precedence pursuant to Recital 47 and 49 of the GDPR for the protection of the Data Controller's activities	Legally mandatory provision: without your data it will not be possible to enter into or perform the contract and fulfil the requirements of the data subject	Up to 10 years after the termination of the contractual relationship or of the pre-contractual requirements
Protection of company assets through a video surveillance system	The Data Controller's legitimate interest, which shall be deemed to take precedence pursuant to Recital 47 and 49 of the GDPR for the protection of the Data Controller's activities	Refusal to provide data will make it impossible to access company premises	5 working days (unless extended due to office/company closure periods or holidays)

**The way data are processed:** data shall be processed in hard copy or electronic form or other means of communication in order to ensure the security and confidentiality of the data as well as full compliance with the legislation. Data processing will be carried out by automated means that do not generate the profiling of the data subjects.

**2. RECIPIENTS, COMMUNICATION AND DISCLOSURE (who we share your data with, whether and how we publish your data)**

The data will not be disseminated and, with regard to the processing of your personal data for the purposes listed above, the possible categories of recipients could be:

1) Parties within the organisation in their capacity as persons authorised to process, such as:

- Board of Directors;
- CFO and CIO, management control;
- Representative;
- RQAS;
- Customer;
- Accounting;
- Integrated Logistics Office;
- Production;
- Video surveillance officers (for the video surveillance system only);
- The trade union body elected by workers;
- Maintainers (for the video surveillance system only);
- Interns from these areas.

2) Parties outside the organisation, such as:

- Agents and sales agencies;
- Accountants, chartered accountants, data processing centres;
- Environmental companies and consultants;
- Lawyers and law firms;
- Hardware, software, network and e-mail technicians;
- Auditors;
- Supervisory Body;
- Communication agencies;
- Supervisory institute;
- Video surveillance system maintenance company;
- Manager of the Whistleblowing channel.

Parties belonging to the above-mentioned categories shall use the data in their capacity as independent data controllers or joint controllers, as applicable, pursuant to Reg. (EU) 2016/679 and the applicable national legislation, being unrelated to the original processing carried out in our company; or in some cases, in their capacity as data processors if duly appointed for said purpose. The list of names of those who have obtained or will obtain your data is available from the contacts of the Data Controller.

For the purposes indicated in this privacy policy, personal data will not be transferred abroad to countries outside the European Union or to international organisations.

**Third party data:** if the Customer is a natural person, the provisions laid down herein on personal data shall apply. If the Customer is a legal entity, the processing of personal data does not need to comply with the relevant legislation except for marketing purposes. However, any employees/contractors who are natural persons may (directly or in the name and on behalf of the Customer) provide personal data for the performance of the contract. In this case the Customer must ensure that the natural persons (such as the Customer's employees, contractors, customers, suppliers and consultants) have been made aware of the Controller's privacy statement, by providing them with a hard copy or by indicating where it can be accessed, and by obtaining the consent (if required) of the data subject, exempting the Data Controller of any responsibility or third-party claim on the matter.

**3. YOUR RIGHTS (such as the requests you can make in order to exercise your rights regarding the processing)**

We hereby inform you that you may exercise the following rights at any time:

You have the right to ask the Data Controller for access to your personal data, requesting confirmation as to whether or not it holds your personal information, or asking it to rectify or delete the data, or restrict (temporarily) the use of any of your data.
You have the right to object to the processing of your personal data at any time in specific circumstances such as: I) the processing required for the performance of a task carried out in the public interest or connected with the exercise of powers by the authorities; II) in order to pursue the legitimate interest of the data controller.
If you gave your consent for one or more specific purposes, you have the right to withdraw your consent at any time.
You have the right to data portability (for data with a legal basis for contractual or consensual commitments) by asking the controller, by means of a .csv. .xml or similar file.

**4. COMPLAINT TO THE SUPERVISORY AUTHORITY (who to contact externally in the event of negligence on our part)**

You have the right to complain to the following Supervisory Authority: Data protection authority (<http://www.garanteprivacy.it>); you also have the right to make a complaint to the competent authority of the member state where you normally reside, work or the place where the alleged breach took place.

**5. DATA CONTROLLER**

**Data Controller: Stiferite S.p.A.** – Via della Navigazione Interna, 54 int. 5 – 35129 Padua (PD) - e-mail: [privacy@stiferite.com](mailto:privacy@stiferite.com).

The entire content of Articles 7, 8, 9, 12, 13, 14 and 15-22 of Regulation (EU) 2016/679 of Legislative Decree 196/03 reviewed by Legislative Decree 101/18 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, is available from our office and on our website [www.garanteprivacy.it](http://www.garanteprivacy.it)

Padua (PD), 20/02/2025

**Data Controller**

**Stiferite S.p.A.**

Il Presidente  
Paolo Stimamiglio

