

## CUSTOMER PRIVACY POLICY

pursuant to art. 13 Regulation (EU) n. 679/2016 – GDPR

**Data controller** Tierre Group S.p.A., with registered office in via dell'Industria, 18 – 20032 Cormano (MI) and production site in via Marco Biagi, 1 – 25045 Castegnato (BS) - mail: [privacy@tierregroup.com](mailto:privacy@tierregroup.com).

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**Personal data processed** The personal data provided by you or acquired by us during the **negotiation, establishment and/or execution of the commercial / contractual relationship established with you or with the company for which you work** (such as, for example, name and surname, e-mail, address, company name, VAT number, tax code, bank and tax details, company affiliation and company role)

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**Purpose and legal basis of the processing** a) **give full and correct execution to the commercial / contractual relationship established with you or with the company for which you work (example: create and manage your supplier master data, issue purchase orders, make payments, manage complaints, invoicing and obtaining payment of amounts owed to us)**

*Legal basis:* the need to execute the existing commercial relationship / contract, pursuant to art. 6.1 lit. b) of the GDPR

b) **fulfill legal obligations under civil, tax and accounting regulations**

*Legal basis:* the need to fulfill legal obligations, pursuant to art. 6.1 lit. c) of the GDPR

c) **carry out direct marketing activities, commercial information, sending communications, offers, newsletters and invitations to events and fairs**



*Legal basis:* our legitimate interest pursuant to art. 6.1 lit. f) of the GDPR, over which we believe that none of your rights, interests or fundamental freedoms prevail, as well as - where applicable - art. 130 co. 4 of the Privacy Code

d) **exercise / defend our right in court**



*Legal basis:* our legitimate interest pursuant to art. 6.1 lit. f) of the GDPR, over which we believe that none of your rights, interests or fundamental freedoms prevail

**Storage  
time of  
your  
personal  
data**

We will process your data **for the entire duration of the commercial relationship / contractual relationship** with you or with the company for which you work and we will keep them **for 10 years** from the termination of the commercial relationship / contractual relationship in order to comply with inspections by the competent authorities, with current legal obligations in civil, tax and accounting matters and to defend / protect us in court in compliance with the statute of limitations established by law.

The data provided for direct marketing activities, to send you commercial communications, offers, newsletters and invitations to events and fairs will be processed and stored by us **for the entire duration of the commercial relationship / contractual relationship in place and up to 2 years** from the termination of the business relationship / contractual relationship. This processing and retention period is believed to be justified by the fact that our newsletter is on a monthly basis and is mostly directed to clients who are legal entities. However, it remains understood that, in the event of opposition to the processing of data for this purpose, newsletters, invitations, commercial communications and offers will no longer be sent to you.

In the event that a **dispute** arises, we will process your data for the period that will be necessary in relation to this dispute.

Once the time periods indicated above have elapsed, your data will be **deleted or made anonymous**.

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**Recipients  
of  
personal  
data**

Your data may be communicated or made accessible to the **following categories of third party recipients**: banks, couriers and shippers, IT system management and maintenance service providers, management system providers, virtual server management software and CRM programs, agents, administrative service providers, legal and tax consultants, auditing firms. Where necessary, we will appoint these third parties as our data processors pursuant to art. 28 of the GDPR.

Within our **corporate organization**, employees in the Commercial, Service, Finance, IT functions and other functions from time to time involved in the processing operations covered by this information may have access to your data. All the aforementioned subjects will be authorized and instructed by us to process, pursuant to art. 29 of the GDPR.

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**Nature of data provision**

The provision of your data for the above purposes is **mandatory**, it being understood that you always have the possibility to object to the processing of your data for the purposes referred to in point c).

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**Your rights**

You may exercise the rights granted to you by the GDPR at any time, including your right to request:

- - **access** to your data, together with indications relating to the purpose of the processing, the category of data processed, the recipients of the data, when possible their retention period or the criteria used to determine it, the existence of the following additional rights
    - the **rectification** of your data, if they are inaccurate or incomplete
    - the **cancellation** of your data, if one of the conditions referred to in art. 17 of the GDPR
    - the **limitation** of the processing of data concerning you
    - your data in a structured format, commonly used and readable by an automatic device also for the purpose of transmitting them to another holder, if the treatment is based on consent or on a contract and is carried out by automated means (**so-called right to data portability data**)
- You also have the right to:
- **oppose** the processing of your data, unless there are compelling legitimate reasons for the Data Controller to proceed with the processing
  - **propose a complaint** to the Guarantor for the protection of personal data, following the procedures and indications published on the official website of this authority ([www.garanteprivacy.it](http://www.garanteprivacy.it))

We will inform each of the recipients of the data of any corrections or cancellations or limitations of the treatment, unless this proves impossible or involves a disproportionate effort. The exercise of the above rights is not subject to any form constraint and is free of charge. We may only ask you to **verify your identity** before taking further action on your request.

**To exercise your rights**, you can write an e-mail or send a request to the addresses indicated in the [Data Controller section](#).

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## PRIVACY – PROTECTION OF PERSONAL DATA

- 1.- The customer declares to have read and understood the privacy information prepared in accordance with the provisions of Regulation (EU) n. 679/2016, attached to this contract under the Privacy Annex.
- 2.- By signing this contract, the customer undertakes to disseminate and share the content of the above privacy information with their employees and any auxiliaries who will come into contact with Tierre Group S.p.A. for the purposes of the execution of this contract, providing, upon reasonable request by Tierre Group S.p.A., written proof of the release and sharing of the aforementioned information.