

CUSTOMERS PRIVACY NOTICE

Rev. 1 del 09/04/2022

Pursuant to Article 13 of EU Regulation 2016/679 (hereinafter, the "GDPR"), Nichelcrom Acciai Inox S.p.A. ("Data Controller" or "Nichelcrom") provides you with information regarding the processing of your personal data. Your data will be processed lawfully, fairly and in a transparent manner in order to protect your privacy and guarantee your rights as a data subject.

PURPOSES AND LEGAL BASIS – CATEGORIES OF DATA - PROVISION OF DATA AND CONSEQUENCES IN CASE OF REFUSAL

Nichelcrom collects your personal data because the processing is necessary for our business relationship, for the performance of a contract to which you/your company are/is party or in order to take steps at your/your company's request prior to entering into a contract; we may also process your data for accounting purposes as well as to comply with legal obligations (e.g., required by civil, fiscal or safety and security laws) and, where necessary, for legitimate interest in collecting our credits and in establishing our legal rights. Nichelcrom may, in addition, use your personal data for legitimate interest to:

- carry out customer satisfaction surveys by means of electronic questionnaires (that you will always be free not to fill in) periodically available in your/your company's online Reserved Area;
- promote via telephone or e-mail services or products similar to those you/your company already purchased, (you will always have guaranteed the opportunity to object to such use of your contact details).

During the pre-contractual phase, we may process the following information relating to natural persons:

- identity and contact details (e.g., telephone number, e-mail, business address) regarding you and/or your company's legal representative and/or any other person requesting our services/products on behalf of you/your company;
- any other personal data that you may freely provide in your requests of information or during the negotiation.

When we enter into a contract with you/your company, we may process the following additional information relating to natural persons:

- if you are our customer as a natural person/individual economic operator, we may process your fiscal and business identification details (e.g., tax identification number, VAT number, bank and invoicing details, payment status) and other personal data that you may freely provide during our business relationship or that may be included in documents that we share while executing the contract;
- if the customer is a legal person, we may process identity, contact details and other relevant information (e.g., such as roles and tasks) of the customer's personnel entitled to deal with us as well as other personal data that you/your company may freely provide during our business relationship or that may be included in documents that we share while executing the contract;

If you/your company have/has activated an account in the customer's Reserved Area available in our website www.nichelcrom.com, we will store the login details (please note that a special encryption algorithm will automatically and irreversibly pseudonymize the password so that will be unintelligible to anyone) and we will be entitled, always for purposes of management of our business relationship, to gain access to orders, invoices and other relevant contractual documents that main contain some personal data. Considering that the

customer's Reserved Area can be reached starting from the URL www.nichelcrom.com, we kindly ask you to read also the Privacy & Cookie Policy of our main website to know how we process its users personal data. With the exclusion of any other freely given data, it is mandatory the provision of those personal data that are essential in order to deliver a commercial offer or to enter into a contract and execute it. Any refusal to provide such data may make it impossible to carry out the activities required for the phases of proposal, closing and execution of the contract.

MEANS OF PROCESSING AND DATA RETENTION

The processing of your personal data is carried out both manually and by means of electronic instruments. Procedural, technological, physical and organisational security measures are implemented to ensure the integrity and confidentiality of the personal data, to prevent their loss or misuse also by protecting our processing systems and services from unauthorized access.

If we enter into a contract with you/your company, the personal data will be generally kept for ten years after its conclusion due to legal storage obligations. If we do not enter into a contract, we may keep the personal data for up to five years in the legitimate interest of conservation of the business contacts (also for the case of subsequent activation of the commercial relationship). Except in the case of litigation or legal obligations that may justify further retention, at the expiry of the aforementioned terms the data are destroyed or otherwise deleted or, at least, anonymized whenever Nichelcrom may have an interest in their preservation in order to perform aggregate business analysis or statistics.

AUTHORIZED PERSONNEL AND RECIPIENTS OF THE PERSONAL DATA

Within our organization, in the pre-contractual phase, the data may be processed by authorized personnel belonging to our management and administration, to our commercial and production departments as well as by personnel that support our ICT system. During the execution of the contract, the data may also be processed by authorized personnel belonging to other departments such as quality, production, warehouse and shipping.

Outside our organization, the following types of suppliers can access the personal data that act in the role of data processor pursuant to Article 28 of the GDPR:

- providers of ICT platforms that we use, within the limits of technical administration and data storage (e.g., e-invoicing, electronic archiving);
- companies that support our website and our ICT system, within the limits of interventions aimed at technical administration, programming and development.

Some data processed during the execution of the contract may be communicated to the following categories of recipients:

- public authorities and public bodies for the fulfilment of legal obligations (e.g., to the Inland Revenue Agency for the e-invoicing and to customs authorities for cross-border shipments);
- firms providing accounting and tax services;
- bodies responsible for the supervision and control of our company;
- consultants such as, for example, agents, lawyers or debt collectors;
- shippers for the delivery of products, documentation and material;
- if provided by the contract, subcontractors who may perform services on our behalf;
- banks for payments, adjustments, refunds, etc.;
- judicial or public security bodies in case we are requested to comply with a legal order.

The identity of the third parties listed above is available upon request to be send at privacy@nichelcrom.com.

DATA TRANSFER TO NON-EU COUNTRIES

Nichelcrom transfers the customers' personal data outside the EU or the European Economic Area (EEA) only if:

- this is necessary for the performance of the contract or for the implementation of pre-contractual measures taken at the data subject's request;
- one of the other conditions set out by art.49, paragraph 1 of the GDPR is met (e.g. if the transfer is necessary for important reasons of public interest or if the transfer is necessary for the establishment, exercise or defence of legal claims).

If we may need to use services providers located outside the EU or the European Economic Area (EEA) that could have access to some suppliers' personal data, the Data Controller will provide full information and will take every appropriate contractual and non-contractual measure to ensure an adequate level of protection in accordance with and in the manner indicated in Chapter V of the GDPR and/or in other data protection provisions applicable at the time. You can always ask for more information about possible data transfer to non-EU/EEA third parties by sending a request to privacy@nichelcrom.com.

RIGHTS OF THE DATA SUBJECT

In accordance with articles 15, 16, 17, 18 and 21 of the GDPR the data subject has, among the others, the right to access, rectify, or delete his personal data collected and processed by the Data Controller. The data subject also has the right to lodge a complaint with the competent data protection authority if he thinks his data have been processed unlawfully.

DATA CONTROLLER'S IDENTITY AND CONTACT DETAILS

The Data Controller is Nichelcrom Acciai Inox S.p.A. with registered office in Via Trento 96 – 20099 - Sesto San Giovanni (MI). For any question about how we process your personal data or if you want to exercise your GDPR rights, please contact us by e-mail at privacy@nichelcrom.com.