

PRIVACY POLICY – CUSTOMERS AND SUPPLIERS

Under articles 13 and 14 of the EU Regulation no. 679/2016 (so-called GDPR), below is provided the information related to the personal data processing of customers and suppliers of the companies of the Paper Board Alliance SpA group. We reserve the right to change this Privacy Policy at any time. These changes will be effective after 15 days from the date of their publication on the website of the Companies of the Paper Board Alliance SpA group.

1. Responsible Party

The responsible party of your personal data processing are indicated in the table below.

Responsible Party of your personal data		Responsible for your personal data processing , Name and Address
Name	Registered office	
Paper Board Alliance SpA	Corso Di Porta Romana N. 61 c/o Chiostro Di San Lazzaro – 20122 Milano	Giuseppe Cima Viale Alcide De Gasperi, 1 - 23801 Calolziocorte LC
Cartiera dell'Adda Srl	Corso Di Porta Romana N. 61 c/o Chiostro Di San Lazzaro – 20122 Milano	
CDA Servizi Srl	Via Cavour, 63 - 23801 Calolziocorte LC	
Dimeco Srl	Via F.lli Cuzio 42 - 27100 Pavia	
ICP Industria Cartaria Pieretti SpA	Via Fanuccio, 128 - 55014 Capannori LU	
Sillaro Centro Taglio Srl	Località Zona Industriale - 26814 Livraga LO	

2. Purpose of the treatment

A) The personal data you provide are necessary for the obligations required by law:

- operational, administrative and accounting management (including any e-mail transmission of commercial invoices) regarding the contractual relationship connected to the provision of the services and products offered;
- use of your data (particularly your e-mail address) by the companies of the Paper Board Alliance SpA group to carry out communications referring to the performance of the contractual relationship established;
- fulfilment of legal obligations related to the mentioned business relationship;
- organizational management of any ongoing or being finalized business relationship;
- contractual rights protection;
- pursuit of the legitimate interest of the data controller or third parties;
- collection and storage of personal data to provide the Judicial Authority with any information requested

B) and for non-core activities linked to commercial and contractual activity including:

- sending detailed information on the services and products of the companies of the Paper Board Alliance SpA group, also through automated tools

3. Nature, Method and Storage of data processed

The processing will be carried out in an automated and / or manual form, in compliance with the provisions of art. 32 of the GDPR 2016/679 regarding security measures, by persons specifically appointed and in compliance with the provisions of art. 28 and 29 GDPR 2016/679.

We shall point out that, in compliance with the principles of lawfulness, purpose limitation and data minimization, under art. 5 GDPR 2016/679, subject to your free and express agreement which is at the end of this Privacy Policy, even though, it is not necessary for the purposes referred to in point 2 lett. A), the personal data processed shall be exclusively ordinary data (particularly, personal and contact data), which are strictly necessary and relevant to the purposes referred to point 2 above. The personal data processing provided is carried out by means of the operations or the set of operations indicated in art. 4, no. 2) GDPR: collection, registration, organization, storage structuring, adjustment or modification, extraction, consultation, use, communication by transmission, disclosure or any other available form, comparison or interconnection, limitation, cancellation or destruction. The processing will be carried out, both manually and with the aid of IT, telematic or otherwise automated tools. The processing is carried out both directly by the owner's organization and with the help of its managers / appointed persons.

4. Nature of the provision and consequences of refusal

You shall not be obliged to provide the companies of the Paper Board Alliance SpA group with the data that will be requested. However, in case of refusal to provide data for the purposes referred to in paragraph 2 lett. A) we inform you that we shall be unable to provide complete or partial provision of the service.

5. Sources and area of communication and data disclosure

We collect data from various sources, including, but not limited to:

- directly from the interested parties (telephone and / or written correspondence);

- b) sources of available reference to the public such as: websites, archives, public registers and / or documents known or accessible on the internet;
- c) employers and / or contractual counterparties of the interested parties;
- d) companies with which the Company of the Paper Board Alliance SpA group has ongoing contractual relationships due to the social activity carried out;
- e) contacts that the person has left on the websites and social networks of the companies of the Paper Board Alliance SpA group.

We also inform you that the data collected shall never be disclosed and shall not be communicated without your, express agreement except for the necessary communications that may involve the data transfer to public bodies, consultants or other subjects for the fulfilment of contractual obligations and of law.

The ordinary data (personal and /or personal) or the results of the statistical analysis referred to above may be communicated, on a mandatory and necessary basis for the provision of services to: persons, companies or professional firms that provide assistance, consultancy or collaboration with the Company of the Paper Board Alliance SpA group in accounting, administrative, legal, tax, financial, health and safety at work matters; system and product certifications, subjects delegated and / or appointed by the Company of the Paper Board Alliance SpA group to carry out the activities or part of the activities related to the provision of services and the sale of products; to external collaborators and to those subjects to whom the communication is necessary for the correct fulfilment of the obligations assumed by the Company of the Paper Board Alliance SpA group in relation to the contract for the supply of its services; Public Administrations for the performance of institutional functions within the limits established by law or regulations, subsidiaries or parent companies.

6. Existence of an automated decision-making process, including profiling

The Company's decision-making procedures, including profiling, provide for the maintenance of human relationships. Therefore, Article 22 of EU Regulation no. 679/2016.

7. Duration of treatment

Your personal data will be stored at least for the period of time required to achieve the purposes for which they are collected and processed. In some cases, the data may be stored longer, unless you expressly ask to delete them. The treatment shall not last longer than necessary for the purposes for which the data were collected in conformity with the legal obligations in force such as those of a civil, fiscal nature in force, health and safety at work, system and product certifications.

8. Transfer of personal data

For the sole purpose of the "obligations required by law" referred to in the previous articles, the personal data provided may be transferred to countries of the European Union.

9. Rights of the interested party

At any time, you can exercise, under articles 15 to 22 of EU Regulation no. 2016/679, the right to:

- a. ask for confirmation or not of personal data existence;
- b. obtain information on the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or shall be communicated and, when possible, the retention period;
- c. obtain the correction and deletion of data;
- d. obtain the limitation of the processing;
- e. obtain data portability, i.e., receive them from a data controller, in a structured format, commonly used and readable by an automatic device, and transmit them to another data controller without hindrance;
- f. oppose the processing at any time and also in the case of processing for direct marketing purposes;
- g. oppose an automated decision-making process relating to natural persons, including profiling;
- h. ask the data controller for access to personal data;
- i. withdraw the consent at any time without prejudice to the lawfulness of the processing based on the consent given prior to the revocation;
- j. file a complaint with a supervisory authority.

You can exercise your rights with a written request sent to the company's registered office or to the email address privacy@pbaspa.com.

Calolziocorte, 24.03.2021

CEO
Ing. Giuseppe Cima