

PRIVACY POLICY

(Article 13 of Regulation (EU) 2016/679 of 27 April 2016 on the protection of personal data – “GDPR”)

In compliance with the provisions set out by the General Data Protection Regulation, the Data Controller hereby provides the data subject with the following information regarding the processing of their personal data.

- **Data Controller:**
CALEFFI S.P.A., with registered office in SR 229 No. 25 - 28010 Fontaneto d'Agogna (NO), Italy – VAT No. IT04104030962
- **Contact details:**
privacy@caleffi.com

Processing activity: Management of customer data related to the Controller's Services.

- **Categories of data subjects:**
Customers of the Controller's Services.
- **Purposes of the processing:**
Management of administrative and accounting activities related to the conclusion of the contract, the subsequent invoicing and the payment of the Service.
- **Legal basis:**
 - Performance of a contract and/or pre-contractual measures: for the provision of the Services contractually agreed upon.
 - Legal obligation: to comply with administrative, accounting and tax obligations connected with the establishment and management of the contractual relationship.
- **Types of mandatory data:**
Tax data – online payment data – personal contact details – personal identification data.
The requested data are mandatory in order to activate the Service.
- **Security measures:**
Such data will be processed exclusively by electronic means and protected by appropriate technical and organisational security measures.
- **Categories of recipients:**
The collected data may be disclosed, for compliance with legal obligations or for strictly functional reasons in the context of contract performance, to the following categories of recipients: the Data Processor and any Sub-processors.
- **Data Processor:**
The collected data will be managed through the platform of the Data Processor, Chargebee Inc.
Pursuant to and for the purposes of Article 28 of Regulation (EU) 2016/679, Chargebee Inc., in its capacity as Data Processor, will process the collected data for the purpose of processing payments made by the Customers of the Services, including through any Sub-processors. For further information, please refer to the following link:
https://www.chargebee.com/privacy/dpa/?sbr=1aHn89oSpGIUTetUghJXkcQ%3D%3D%24_amrajPvQIEInDLtXrR4yA%3D%3D
- **Retention period:**
Data will be retained for a maximum period of 10 years.
- **Automated decision-making:**
Processing is not based on automated decision-making.
- **Transfers of data outside the EEA:**
Personal data will be stored at the Company's registered office and on Group servers located within the European Economic Area (“EEA”). Data will also be processed by the Data Processor and any Sub-processors. Should personal data be transferred by the Data Processor or any Sub-processors to a country outside the European Economic Area, they shall ensure that such transfer takes place in

accordance with Articles 45 and 46 of Regulation (EU) 2016/679.

- **Data subject's rights** (Articles 15 to 22 and Article 13 of the GDPR)
 - Right of access: Pursuant to Article 15 of the GDPR, the data subject has the right to request access to his/her personal data from the controller.
 - Right to rectification: Pursuant to Article 16 of the GDPR, the data subject has the right to request the rectification of his/her personal data from the controller.
 - Right to erasure ("right to be forgotten"): Pursuant to Article 17 of the GDPR, the data subject has the right to request the erasure of his/her personal data from the controller.
 - Right to restriction of processing: Pursuant to Article 18 of the GDPR, the data subject has the right to request the restriction of the processing of personal data concerning him/her.
 - Right to object: Pursuant to Article 21 of the GDPR, the data subject has the right to object to the processing of his/her personal data.
 - Right to data portability: Pursuant to Article 20 of the GDPR, the data subject has the right to exercise the right to data portability.

Without prejudice to your right to file a claim with the Italian Authority for the protection of personal data, with head office in Piazza Venezia No. 11, 00187 ROME, www.garanteprivacy.it

If you have any questions about this Privacy Policy or wish to contact the undersigned company regarding any legal questions concerning the processing of your Personal Data, please contact the Caleffi S.p.A. Privacy Team at the following e-mail address: privacy@caleffi.com