



O.M.F. dei F.Lli FUMAGALLI

PRIVACY POLICY MODEL

For Clients/Suppliers pursuant to and for the purposes of Regulation (EU) 2016/679

Dear Company,

We wish to inform you that European Regulation no. 679 of 27 April 2016 on the processing of personal data provides for the protection of natural persons and legal entities with regard to the processing of personal data.

Pursuant to article 13 of Reg. (EU) 2016/679, we therefore invite you to take note of this policy.

1. IDENTITY OF THE DATA CONTROLLER.

The Data Controller is the company **O.M.F. DEI F.LLI FUMAGALLI S.R.L.** with registered offices in Via Alessandro Volta 20/20 A - 24011 - ALMÈ (BG), represented by its pro tempore legal representative, tel. +39 035 545030 - email amministrazione@omffumagalli.it.

2. PURPOSE OF DATA PROCESSING

The processing of personal data provided is for the purpose of:

- a) fulfilment of the contract.
- b) compliance with legal obligations related to the contractual relationship.
- c) contract management, e.g., relations with agents, representatives, principals and/or contractors.
- d) external professional collaboration required for the fulfilment of legal obligations.
- e) protection of contractual rights.
- f) internal statistical analyses.
- g) marketing activities involving the sending of promotional and advertising material concerning products or services similar to those covered by the existing business relationship.

The legal basis for processing is the contract and the explicit consent to the processing of data for the aforementioned purposes, consent that forms an integral part of this information sheet.

3. METHOD OF PROCESSING

Personal data will be processed in printed, digital and telecommunication form and entered into the relevant databases, which can be accessed by the data processors.

Processing may also be carried out by third parties who provide specific processing, administrative or instrumental services necessary for the achievement of the aforementioned purposes.

All data processing operations are conducted in such a way as to guarantee the integrity, confidentiality and availability of personal data.

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Email: omf@omffumagalli.it - amministrazione@omffumagalli.it - qualita@omffumagalli.it

Certified email: omf@pec.omffumagalli.it - Website: www.omffumagalli.it

Tax Code and VAT no. - Business Register BG 02823550161 - EAI 326691 - Share Capital 14,960.00 fully paid-up



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4. DATA STORAGE PERIOD.

The data provided will be held for the duration of the contractual relationship and in any case no later than ten years after the termination of any business relationship.

5. SCOPE OF COMMUNICATION AND DISCLOSURE OF DATA.

In relation to the purposes set out in point 2, the data may be communicated to the following entities:

- Rating organisations.
- Banking institutions for the management of income and payments.
- Financial administrations or public institutions in fulfilment of regulatory obligations.
- Companies and law firms for the protection of contractual rights.
- Agents and representatives.
- Principals and/or contractors within the framework of a contract/subcontract (also to fulfil the duties arising from joint and several liability pursuant to art. 29 of Italian Legislative Decree no. 276/2003).

6. RIGHTS PURSUANT TO ARTS. 15, 16, 17, 18, 20, 21 and 22 of REG. (EU) 2016/679.

We hereby inform you that as data subject, you also have the right to file a complaint with the Data Protection Authority, in addition to the rights listed below, which you may enforce by making a specific request to the Data Controller and/or Data Processor, as indicated in point 1.

Art. 15 - Right of access

The data subject shall have the right to obtain confirmation from the Data Controller as to whether or not personal data concerning them are being processed and, if so, to obtain access to such data and to information regarding their processing.

Art 16. - Right to rectification

The data subject shall have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning them without undue delay. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Art. 17 - Right to erasure ("right to be forgotten")

The data subject shall have the right to obtain from the Data Controller the erasure of personal data concerning them without undue delay and the Data Controller shall have the obligation to erase personal data without undue delay.

Art. 18 - Right to restriction of processing

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.

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- The processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to article 21, paragraph 1, pending the verification whether the legitimate grounds of the Data Controller override those of the data subject.

Art. 20 - Right to data portability

The data subject shall have the right to receive the personal data concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

In exercising their right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Art. 21 - Right to object

The data subject shall have the right to object, on grounds relating to their particular situation, at any time to processing of personal data concerning them pursuant to point (e) or (f) of article 6, paragraph 1, including profiling based on those provisions.

Art. 22 - Right not to be subject to automated decision-making, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

Almè 28 November 2025

The Data Controller

O.M.F. DEI F.LLI FUMAGALLI S.R.L.

Withdrawal of consent to processing

Please note that, pursuant to art. 7 of the Regulation, you have the right to withdraw your consent to the processing of your personal data in writing, which may be sent to the following address: **O.M.F. DEI F.LLI FUMAGALLI S.R.L.**, Via Alessandro Volta 20/20A - 24011 - ALMÈ (BG), tel. +39 035545030 - email: amministrazione@omffumagalli.it

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