

PRIVACY POLICY: INFORMATION FOR DATA SUBJECTS

2.3. CUSTOMERS INFORMATION



DATA CONTROLLER

COMPANY NAME	MOBIL PLASTIC S.p.A.
REGISTERED OFFICE	Via S. Gregorio, 55 – 20124 Milano (MI)
VAT NUMBER	00186030185

PRIVACY POLICY

In accordance with the provisions of EU Regulation No. 679/2016 (hereinafter the “Regulation”) in Article 13 - Information to be provided where personal data are collected from the data subject, **MOBIL PLASTIC S.p.A.**,

(hereinafter the “Company”), provides the following information on the processing of its customers' personal data (hereinafter the “Data”) carried out by the Company, in its capacity as Data Controller.

Identity of the Data Controller and contact details

Pursuant to Article 4 of the Regulation, the Company is the data controller of its customers' Data. For communications or requests, the Company can be contacted by email at:

E-MAIL	info@mobilplastic.it
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Categories and types of data collected and processed

The Data processed by the Company includes personal data, not belonging to special categories (Article 9 of the Regulation), collected for the purposes of concluding the contract and in the context of its execution and/or stipulation.

Furthermore, the processing of personal data of third parties communicated by customers may also occur. In this case, customers act as independent data controllers and assume the resulting legal obligations and responsibilities, indemnifying the Company against any dispute, claim, and/or request for compensation for damage resulting from processing that may be received by the Company from interested third parties.

Specifically, the following information is collected:

- Information provided when using our Services, including contact information, activity and performance information, and information about measures taken so that we can recommend the best product for you.

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Purpose and legal basis of processing and nature of data provision

In compliance with current legislation on the protection of personal data and without the need for specific consent from the Data Subject, the Data will be stored, collected, and processed by the Company for the following purposes:

- a) fulfillment of contractual obligations, execution and/or stipulation of the contract and/or management of any pre-contractual measures;
- b) fulfillment of any regulatory obligations, tax and fiscal provisions arising from the conduct of business activities and obligations related to administrative and accounting activities;
- c) sending, directly or through third-party marketing and communication service providers, newsletters and communications for direct marketing purposes via email, SMS, MMS, fax, paper mail, and telephone with an operator, in relation to products provided;
- d) communication of Data to third-party companies for the sending of newsletters and communications for marketing purposes via email, SMS, MMS, fax, paper mail, and telephone with an operator.

The legal bases for processing for the purposes indicated in a) and b) above are Articles 6.1.b) and 6.1.c) of the Regulation. Il conferimento dei Dati per i suddetti fini è facoltativo, ma l'eventuale mancato conferimento dei Dati stessi e il rifiuto a fornirli comporterebbero l'impossibilità per la Società di eseguire e/o stipulare il contratto ed erogare le prestazioni richieste dallo stesso.

The legal basis for the processing of personal data for purposes c) and d) is Article 6.1.a) of the Regulation, as the processing is based on consent; it should be noted that the Data Controller may collect a single consent for the marketing purposes described herein, pursuant to the General Provision of the Italian Data Protection Authority "Guidelines on promotional activities and combating spam" of July 4, 2013. Consent to the use of data for marketing purposes is optional and if the data subject wishes to object to the processing of data for marketing purposes carried out by the means indicated herein, as well as to revoke the consent given, they may do so at any time without any consequences (except for the fact that they will no longer receive marketing communications) by following the instructions in the "Rights of the Data Subject" section of this Policy.

Data processing methods

In relation to the purposes indicated, the Data is processed using manual, computerized, and telematic tools with logic strictly related to the purposes themselves and, in any case, in such a way as to guarantee the security and confidentiality of the Data, in addition to compliance with the specific obligations established by law. The Data will be processed in compliance with the principles of lawfulness, fairness, relevance, and non-excessiveness, in accordance with the provisions of the legislation on the protection of personal data. The processing will be carried out by formally appointed and adequately trained personnel.

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Scope of communication and dissemination of Data, recipients and transfer of Data, and Data processors

For the aforementioned purposes, the Data may be disclosed to third parties appointed as data processors pursuant to Article 28 of the Regulation and, in particular, to banks, insurance companies, providers of services strictly necessary for the performance of business activities, or company consultants, where this is necessary for tax, administrative, or contractual reasons or for requirements protected by current regulations.

Finally, the Data may be shared with authorities, bodies, and/or entities to whom the Data must be communicated pursuant to legal provisions or orders from authorities. These authorities, bodies, and/or entities will operate as independent data controllers.

The Data will not be disclosed.

The periodically updated and complete list of data processors appointed to process the Data may be requested by sending an email to the Data Controller at the above addresses.

Transfer of Data to international organizations and/or countries outside the EEA (European Economic Area)

Any transfer of Data to international organizations and/or countries outside the EEA will take place in accordance with one of the methods permitted by current legislation, such as the consent of the data subject, the adoption of Standard Clauses approved by the European Commission, the selection of entities participating in international programs for the free movement of data (e.g., EU-US Privacy Shield) or operating in countries considered safe by the European Commission.

Upon request, further information can be obtained from the Company at the above contacts.

Data Retention

Your information will be retained for as long as you are an active customer of the Company. Once you have deleted your account or no longer use our products and Services, the data will be stored on paper and/or electronic media for only as long as necessary for the purposes for which it was collected, in accordance with the principles of storage limitation and minimization referred to in Article 5, paragraph 1, letters c) and e) of the Regulation.

The Data will be retained to comply with regulatory obligations and pursue the above purposes, in accordance with the principles of indispensability, non-excessiveness, and relevance.

Information from deleted accounts will be retained to comply with the law, prevent fraud, resolve disputes, resolve problems, enforce our agreements, and take other actions permitted by law; subsequently, once the aforementioned reasons for processing no longer apply, the Data will be deleted, destroyed, or simply stored in anonymous form.

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Upon request, further information can be obtained from the Company at the above-mentioned contacts.

Rights of the Data Subject

In relation to the aforementioned processing, each Data Subject may exercise the rights referred to in Articles 15 to 22 of the Regulation.

In particular, the Data Subject has the right to request the Company to access their Data, to correct or delete it, to object to its processing or to request the limitation of its processing in the cases provided for in Article 18 of the Regulation, and to obtain their Data in a structured, commonly used and machine-readable format in the cases provided for in Article 20 of the Regulation.

The Data Subject may also withdraw the consent given pursuant to Article 7 of the Regulation at any time, as well as lodge a complaint with the Data Protection Authority pursuant to Article 77 of the Regulation, if he/she believes that the processing of his/her Data is contrary to the legislation in force. (For Italy: Data Protection Authority www.garanteprivacy.it).

To exercise these rights, write to the Company at the following address:

COMPANY NAME	MOBIL PLASTIC S.p.A.
REGISTERED OFFICE	Via S. Gregorio, 55 – 20124 Milano (MI)

or by sending an email to the following email address:

E-MAIL	info@mobilplastic.it
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In cases of opposition to the processing of Data pursuant to Article 21 of the Regulation, the Company reserves the right to evaluate the request, which will not be accepted if there are compelling legitimate grounds for proceeding with the processing that prevail over the interests, rights, and freedoms of the Data Subject. Requests should be addressed in writing to the Company at the above addresses.