



## **PRIVACY POLICY**

### **Information provided pursuant to Art. 13 of EU Reg. 2016/679 (hereinafter, "GDPR")**

For the Easysnap companies (Easysnap Technology Srl and Easysnap Co-Packing Srl, hereinafter, also, the "Companies" or the "Owners") personal data represent an asset of great value and an asset to be protected and, in this context, they are adopted procedures and behaviors aimed at guaranteeing their protection. Transparency towards data subjects therefore represents a primary objective, pursued through effective communication tools aimed at making basic information on the processing of their data available to interlocutors.

Specifically, this information describes the procedures followed by the Companies, in relation to the processing of personal data collected through the site [www.easysnap.com](http://www.easysnap.com) and any other site attributable to the same. Although relevant from time to time, this information will also apply in relation to the processing of personal data collected, in general, through other methods, for example in the context of the sales of Easysnap products and / or services, or in favor of the Owners themselves.

Furthermore, the interested parties are informed of the following general profiles, valid for all areas of processing:

- all processing takes place in compliance with current privacy regulations (EU Reg. 2016/679 or "RGPD", and Legislative Decree 196/2003 or "Privacy Code", as amended by Legislative Decree 101/18 );
- all the data of the subjects with whom we interface are treated in a lawful, correct and transparent way, in compliance with the general principles provided for by Art. 5 of the GDPR;
- specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access, pursuant to Art. 32 of the GDPR.

#### **Object of the treatment**

"Personal data" means any type of information relating to an identified or identifiable natural person ("Data Subject"). The Companies process personal identification data of customers / suppliers, current and potential (for example, name, surname, company name, personal / fiscal data, address, telephone, e-mail, bank and payment details, etc.) and of them operational contact persons (for example, name, surname, contact details, nationality, date of birth, economic and financial information, details of identification documents, etc.) acquired and used in the context of the sale of products and / or services services.

More generally, the Companies may also process data of a common nature provided voluntarily by the user of the website (for example by filling in forms on the site), such as personal and contact data, or relating to the profession, and some navigation data. As regards the spontaneous sending of one's curriculum vitae by the user and the processing of personal data contained therein, the information pursuant to art. 13 RGD will be provided at the time of the first useful contact with the candidate, pursuant to art. 111-bis of the Privacy Code, as amended by Legislative Decree no. 101/2018. As a rule, the Data Controllers do not process particular categories of personal data (i.e., information revealing the ethnic or racial origin of the Data Subjects, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data aimed at uniquely identifying a natural person, data on the health or sexual life and sexual orientation of the person); if, in specific cases, the Companies collect, or otherwise process, particular categories of personal data, in order to achieve the purposes indicated below, they will always process this data in accordance with the provisions of the law and the requirements indicated in this information on protection of the data asking, in the applicable cases, the consent to the treatment.

#### **Purpose and legal basis of data processing**

The data can be processed for:

- i) respond to requests for information / quotes (legal basis: adoption of pre-contractual measures at the request of the interested party),
- ii) establish commercial relationships and fulfill the pre-contractual, contractual and tax obligations deriving from new professional relationships or those in existence, as well as manage the necessary communications connected to them (legal basis: execution of the contract and adoption of pre-contractual measures at the request of the interested party),
- iii) fulfill the obligations established by law, by a regulation, by community legislation or by an order of the Authority (legal basis: fulfillment of legal obligations),
- iv) exercise a legitimate interest as well as a right of the Data Controller (for example: the right of defense in court, the protection of credit positions; the ordinary internal needs of an operational, managerial and accounting nature),
- v) the communication of data between parent companies, subsidiaries or associates - with particular reference to the parent company Guala Pack SpA (hereinafter, "Gualapack") - for administrative-accounting purposes, or related to organizational, administrative, financial and accounting activities ( legal basis: legitimate interest);
- vi) the management of the subscription to the mailing list and the sending of the newsletter by the Companies and Gualapack (legal basis: consent of the interested party),
- vii) send information and commercial communications relating to products and services similar to those already purchased, to the e-mail address provided in the context of the sale, without prejudice to the possibility of the interested party to object at any time (so-called "soft-spam" ; legal basis: legitimate interest of the Data Controller),
- viii) carry out promotional initiatives, including market research, and send commercial communications in general, by the Companies and Gualapack, relating to the sector of packaging production, packaging and dosing, by e-mail, postal service or telephone calls through staff of the customer care (legal basis: consent of the interested party),
- ix) carrying out profiling activities in order to personalize the marketing activities referred to in the preceding letter and orient the promotional

- offer, also through the analysis of the use of the site, by the Companies and Gualapack (legal basis: consent of the interested party),
- x) for activities related to the functioning and operation of the website, including activities related to registration in the reserved area on the site, and to the use of the related services (legal bases: fulfillment of specific requests of the interested parties and legitimate interest of the Data Controller) .

The provision of data for the purposes under i), ii) and iii) is optional, but necessary to manage and fulfill the requests of the interested parties, as well as for the fulfillment of the legal and contractual obligations of each Data Controller. The provision of data for the purposes under iv) and v), on the other hand, is optional but necessary for the pursuit of the legitimate interests of the Data Controllers. In all these cases, failure to provide the data will make it impossible for each Data Controller to establish or continue commercial relations with the customer or supplier or, in general, to follow up on the requests of the interested parties. The provision of data for the purposes under vi), viii) and ix) is optional and failure to provide them will only make it impossible to carry out the functional activities to achieve the purposes in question, without any consequence with reference to the establishment or execution of the contract with the customer or supplier. The provision of data for the purpose under x) is optional, but necessary to use the services connected to the website.

If it is intended to carry out treatments for different purposes, if applicable, the relevant updated information will be provided and specific consent will be requested from the interested parties.

For the sake of completeness, it should be noted that the Holders will carry out market analyzes, on an aggregate basis, in particular using information relating to sales trends. The information used, not being attributable to identified or identifiable natural persons, does not constitute personal data, and therefore is not subject to the RGPD.

#### **Methods of processing and storage time**

The processing of personal data is carried out by means of the operations indicated in Art. 4, no. 2), RGPD and more precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Personal data are subjected to both paper and electronic and / or automated processing.

The Data Controllers will process personal data for the time necessary to fulfill the purposes for which they were collected and related legal obligations; specifically, the data will generally be kept for a period of time equal to the limitation period applicable from time to time; the data for promotional activities will instead be kept for a period of time equal to 24 months for marketing activities, and 12 months for profiling activities.

#### **Scope of the treatment**

The data are processed by internal subjects duly authorized and instructed pursuant to Art. 29 of the GDPR. It is also possible to request the scope of communication of personal data, obtaining precise information on any external subjects who operate as managers or independent data controllers (eg consultants, technicians, banks, transporters, etc.). When transferring personal data to third parties, the Companies enter into a separate written agreement with the service provider specifying rights and obligations under applicable laws. The data may be subject to intercompany communication between the associated companies.

#### **Cross-border transfer of Personal Data**

The data will, as a rule, circulate within countries belonging to the European Union.

In the event that the recipients referred to in the preceding paragraph are established or process the data in a country outside the European Union, the transfer of data to these subjects will be carried out only: i) if it is occasional and necessary for the execution of a contract concluded with the Data Controller, or the execution of pre-contractual measures adopted at the request of the interested party (Article 49, paragraph 2, letter b) of the RGPD); or in the presence of ii) an adequacy decision of the European Commission, pursuant to art. 45 of the GDPR, which verified how this third country, or more specific sectors within the third country, guarantee an adequate level of protection of the rights of the data subjects; iii) adequate guarantees such as binding corporate rules or standard data protection clauses adopted by the Commission pursuant to art. 46, co. 2, lett. b) of the GDPR; iv) the explicit consent of the interested party pursuant to art. 49, co. 1, lett. a) of the GDPR.

#### **References of the data controllers and contacts**

For the purposes of this information and for the aforementioned purposes i) -x), the following are independent data controllers:

- Easysnap Technology Srl, VAT number 02325901201 - with registered office in Via Carlo Mussa, 266 - 15073 Castellazzo Bormida (AL);
- Easysnap Co-Packing Srl, VAT number 03145410365 - with registered office in Via della Colombaia 14 / d - 40017 San Giovanni in Persiceto (BO).

Specifically, each Company acts as an independent data controller, with reference to commercial relations with each of its customers and suppliers. With regard to marketing and profiling purposes (purposes vi, viii, ix), Easysnap Technology and Easysnap Co-Packing act as independent data controllers together with the lead company Gualapack. As regards the processing of data by Gualapack, please refer to the information available on the website [www.gualapack.com](http://www.gualapack.com)

For any information on privacy or to exercise the rights listed below, please contact us by e-mail at the following address: [gianluca.fornasini@easysnap.com](mailto:gianluca.fornasini@easysnap.com).

#### **Rights of interested parties**

The interested party may exercise the following rights provided for by the RGPD, subject to the relative conditions:

- right to request access to personal data concerning him, and information relating to the processing (Article 15 "Right of access");
- right to obtain the rectification / integration of inaccurate or incomplete data (Article 16 "Right of rectification");
- right to obtain, if there are justified reasons, the cancellation of data (Article 17 "Right to cancellation");
- right to obtain the limitation of processing (Article 18 "Right to limitation");
- right to receive the data concerning him in a structured format (Article 20 "Right to portability");
- right to object to the processing carried out for the legitimate interest of the Data Controller (Article 21);
- right to object to the processing carried out for marketing purposes (Article 21); the opposition to the processing exercised through telematic methods also extends to the sending of commercial communications by means of the postal service or telephone calls with an operator, without prejudice to the possibility of exercising this right in part, for example by opposing only the processing carried out through systems automated communication;
- right to revoke a previously given consent;
- right to submit, in case of non-response, a complaint to the Data Protection Authority.

**CONSENT FORM - FORM TO SUBSCRIBE TO THE NEWSLETTER**

Read and understood the *information on the processing of personal data* [<https://www.easysnap.com/privacy-policy/>], I agree to receive the *newsletter* by Easysnap Technology, Easysnap Co-Packing and Gualapack. I will be able to unsubscribe at any time.

Please send us a copy of this document signed as declaration of your consent, in original copy or by e-mail to [gianluca.fornasini@easysnap.com](mailto:gianluca.fornasini@easysnap.com).