

INFORMATION ON THE PROCESSING OF PERSONAL DATA RELATED TO THE RELATIONSHIP WITH CUSTOMERS AND PROSPECTIVE CUSTOMERS

The following information is intended for natural persons, including professionals, sole proprietorship owners, and representatives/contacts of companies, organizations, associations, and foundations, hereinafter "Data Subjects."

Identity and contact details of the Data Controller

Fracarro Radioindustrie s.r.l., hereinafter also "Fracarro" or "Owner" with registered office in viale delle Querce, 9 – 31033 – Castelfranco Veneto (TV), and contactable at the e-mail address info@fracarro.com, to the PEC fracarro@legalmail.it or by calling 04237361.

Purposes and legal bases

- A. **Management of the pre-contractual phase:** personal data is processed for all needs related to fulfilling requests for information and/or quotes.
- B. **Collection of commercial information:** personal data is processed to collect information for verification of the economic, financial and patrimonial situation of the interested parties, as well as their solidity, solvency and reliability.
- C. **Management of the contractual phase** Personal data is processed for all needs related to the management of the contractual relationship in all its phases (e.g., managing appointments, organizing logistics, managing customer support activities, and fulfilling regulatory obligations imposed on the Data Controller).
- D. **Defensive purposes:** The Data Controller may need to process personal data to manage out-of-court or judicial disputes and litigation.

| Purpose | Legal basis (common data) | Legal basis (special data) |
|---------|--|---|
| A. | Execution of pre-contractual measures. | / |
| B. | Legitimate interest of the Data Controller related to the analysis and definition of business strategies and policies, the identification of suitable parties for initiating or continuing commercial relationships and payment methods and conditions, and the fight against fraud. | / |
| C. | Execution of the contract; Fulfillment of legal obligations. | / |
| D. | Legitimate interest of the Data Controller to ascertain, exercise or defend a right. | To ascertain, exercise or defend a right. |

Retention period

| Purpose | Shelf life |
|---------|--|
| A. | Time required to process incoming requests and subsequent discussions. |
| B. | Time needed to carry out the checks. |
| C. | 10 years from the termination of the contract. |
| D. | 10 years from the final resolution of the dispute. |

Nature of the provision and consequences in case of refusal

| Purpose | Nature | Consequences |
|---------|----------------|--|
| A. | Necessary | Unable to receive the requested information. |
| B. | Not applicable | / |
| C. | Necessary | Inability to initiate or continue the business relationship. |
| D. | Necessary | Inability to manage litigation. |

Scope of communication

The data is processed by internal personnel authorised for specific tasks and is communicated externally according to the following rules:

| Purpose | Categories of external recipients |
|---------|---|
| A. | Agents, commercial consultants, business brokers. |
| B. | Business information companies, agents. |
| C. | Insurance or credit transfer companies, agents, credit institutions, external consultants, entities to whom disclosure is required by law, commercial partners (customers/suppliers). |
| D. | Law firms; debt collection or assignment companies; judicial authorities. |

Since the data is also processed using IT tools, it may also be visible to those who perform assistance/maintenance on such systems.

Transfer of data to a third country or an international organisation

The Data Controller transfers personal data to the countries and under the conditions summarised below:

| Purpose | Transfer Details |
|---------|---|
| A. | The Data Controller uses information technologies provided by Google. Based on this choice, some personal data may be transferred to third-party countries outside of Europe. Transfers are lawful because they are carried out in third-party countries deemed adequate by the European Commission, or because Standard Contractual Clauses, adherence to the Data Privacy Framework, or other valid mechanisms are adopted. For further details on the position of sub-processors, the data subject can consult the following information page: https://cloud.google.com/terms/subprocessors . |
| B. | |
| C. | The Data Controller uses information technologies provided by Google. Based on this choice, some personal data may be transferred to third-party countries outside of Europe. Transfers are lawful because they are carried out in third-party countries deemed adequate by the European Commission, or because Standard Contractual Clauses, adherence to the Data Privacy Framework, or other valid mechanisms are adopted. For further details on the position of sub-processors, the data subject can consult the following information page: https://cloud.google.com/terms/subprocessors . |
| D. | |

Rights of the interested parties

The data subject is granted the following rights:

Access: you can find out whether your personal data is being processed and, if so, obtain access to it and request a copy.

Correction You can request that your personal data be updated, corrected (if inaccurate), or completed if incomplete.

Cancellation: it is possible to obtain the deletion of your personal data under certain conditions (for further information, contact the Data Controller).

Limitation: it is possible to request that the data be marked, so as to limit its processing in the future, under certain conditions (for further information, contact the Data Controller).

Opposition You may object to the processing of your personal data for reasons related to your particular situation, where the processing is based on legitimate interest or is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.

Portability: it is possible to receive the personal data provided to the Data Controller in a structured format and request to transmit them to another data controller if the processing is based on consent or a contract and is carried out by automated means.

Revokes the consensus: it is possible to revoke consent for the purposes that required it, without prejudice to the lawfulness of the processing carried out up to that point.

The specific rights that can be exercised with respect to the processing activities carried out are:

| Purpose | Exerciseable right | | | | | | |
|---------|--------------------|----------------|--------------|------------|------------|-------------|----------------|
| | Access | Correc tion | Cancellation | Limitation | Opposition | Portability | Revoke consent |
| A. | X | X | X | X | | | |
| B. | X | X | X | X | X | | |
| C. | X | X | X | X | | X | |
| D. | X | X | X | X | X | | |

To exercise the above rights, you can use the form available at the link <https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> and forward it to the following address: privacy@fracarro.com. The interested party may request further details regarding the information above (e.g., legitimate interest balancing test or the list of data controllers) at the same address.

It is possible to lodge a complaint with a supervisory authority: for Italy, the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) www.garanteprivacy.it.

FRACARRO RADIOINDUSTRIE SRL

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