

Privacy Policy – Customers and Suppliers (artt. 13 and 14 of the EU Regulation 2016/679)

What does this Privacy Policy cover?



This Privacy Policy is to be construed as information notice pursuant to artt. 13 and 14 of the (EU) Regulation 2016/679 (“GDPR”) and applies to personal data collected and processed by Guala Pack S.p.a., with registered office in Castellazzo Bormida (AL) - Italy, via Carlo Mussa 266 – as data controller - (the “**Controller**”, “**we**”, “**us**” or “**our**”, as the case may be) - relating to you and/or your company (if the data relating to it falls within the definition of “personal data” under applicable data protection legislation) (hereinafter, the “**Data Subject**” or “**you**”) and your legal representatives, employees, collaborators, and contact persons in general, as part of your contractual relationship with us.

It is understood that it is your responsibility to inform your legal representatives, employees, collaborators and contact persons in general of the processing of personal data referred to in this notice and to acquire their consent, if necessary.



What kind of personal data we collect?

We may collect personal data, such as:

- (1) identifiable data such as name and surname, date of birth, ID details, fiscal code and VAT numbers;
- (2) contact details such as e-mail and postal address(es), telephone number(s);
- (3) information related to the occupation or business such as any professional registration, field of activity, positions held within your organization, goods and services offered;
- (4) business information such as financial data and reports, company’s registry/chamber of commerce information, information related to protests or insolvency proceedings, and other information useful to assess technical suitability, reputation or compliance with applicable legislation;
- (5) information related to orders placed and/or contracts;
- (6) payment and billing information such as payment methods used, bank account number, IBAN code, billing e-mail address;
- (7) any other information voluntarily provided by yourself;

The provision of personal information is optional but necessary for the pursuit of the purposes listed below; if personal information is not provided, it will be impossible for us to pursue these purposes.



How do we collect your personal data?

Most of the data we collect is provided to us by you at the time of signing a contract, during the course of a contractual relationship, visits and as part of events, fairs, and training courses. In addition, we may also collect your personal data through third parties (e.g., business information service providers) or public records. We do not use any form of exclusively automated decision-making in connection with the processing of your personal data.



For what purposes and on what legal basis do we process the Data Subject's personal data?

Your personal data will be processed for the following purposes:

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- (1) to enter into and perform the contract to which you are a party and to carry out the activities necessary to fulfill the obligations under the contract, or to take pre-contractual measures at the request of the Data Subject (such as, for example, to respond to requests for information, products, quotations, and assistance);
- (2) to fulfill legal obligations which we are subject to;
- (3) if you are a supplier, in order to assess your technical, economic and financial suitability as well as to verify that you meet the requirements, for qualification or updating purposes;
- (4) if you are a customer, to assess your economic-financial soundness and reliability;
- (5) to ascertain, exercise or defend a right in judicial or administrative proceedings or in arbitration or conciliation procedures;
- (6) to carry out preparatory activities or otherwise related to the execution of extraordinary transactions such as transfers of business units, acquisitions, mergers and demergers;
- (7) as part of the communication of data between parent, subsidiary or affiliated companies, for reporting and administrative-accounting purposes related to activities of an organizational, administrative, financial and accounting nature, as well as to record your personal data in our Customer Relationship Management (CRM);
- (8) to carry out promotional initiatives and to send direct marketing communications, newsletters, as well as to carry out market research on products and services of the Controller or its subsidiaries, parents and affiliates, by e-mail, text message, or similar means, and/or by postal service or telephone calls with operator.

The processing of your personal data for the purposes of the above:

- (1) does not require any consent as it is necessary for the fulfillment of contractual or pre-contractual obligations embedded in the contractual relationship (art. 6(1)(b) GDPR);
- (2) does not require your consent as it is necessary to fulfill the legal obligations to which the Data Controller is subject to (art. 6(1)(c) GDPR);
- (3), (4), (5), (6) and (7) does not require your consent as it is necessary for the pursuit of Gualapack's legitimate interests underlying the same purposes (art. 6(1)(f) GDPR);
- (8) requires the consent of the Data Subject (art. 6(1)(a) GDPR).



How do we process your personal data?

We adopt security measures to protect your personal data from the risks of destruction, loss or alteration (accidental or unlawful) of personal data as well as unauthorized communication or access to them.



Data retention

As a rule, most of your personal data will be retained for the entire duration of the contractual relationship and for 10 years after its termination. Certain data may be retained for a shorter time if the specific purpose for which it was collected is achieved or ceases. For marketing purposes processing, personal data will be retained for a maximum period of 24 months.

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Disclosure of personal data

Your personal data may be made accessible to, brought to the attention of, or communicated to the following parties, who will act as authorized persons, data processors or autonomous data controllers:

- (1) our employees or collaborators in any capacity;
- (2) parent, subsidiary or affiliated companies' employees or collaborators in any capacity;
- (3) public or private entities, natural or legal persons, who carry out processing activities on our behalf or to whom we are obliged to communicate your personal data, by virtue of legal or contractual obligations (e.g., lawyers, notaries, accountants, banks, insurance companies, service providers, consultants, judicial and police authorities, etc.);
- (4) potential buyers, should we transfer the ownership or control of all or part of our company.

You can request us to provide the list of names and contact details of the persons belonging to the above categories of recipients at any time, by contacting us at the e-mail addresses below.

As a rule, we will not transfer your personal data outside the European Economic Area (EEA). In the event that some of the above-mentioned entities are based outside the EEA, we will transfer your personal data – in the absence of adequate decisions and none of the exceptions in art. 49 of the GDPR apply – on the basis of the standard contractual clauses approved by the European Commission by Implementing Decision (EU) 914/2021.



Your rights under data protection legislation

According to artt. 15 to 21 of the GDPR, you have the right to request us to:

1. be informed about your personal data processing purposes and methods;
2. access and receive copies of your personal data;
3. rectify incomplete, inaccurate or outdated data;
4. delete your personal data;
5. restrict the processing of your personal data, where applicable under the GDPR;
6. object to the processing, in whole or in part, as per applicable law;
7. obtain portability of your personal data, if technically feasible.

Where consent is required for the processing of personal data, you may also revoke the consent already given at any time, without affecting the lawfulness of the processing based on the consent given before revocation.

You can exercise the above rights and request any information on the processing of your personal data by contacting us by:

- post: via Carlo Mussa n. 266 – 15073, Castellazzo Bormida (Alessandria) – Italy
- telephone: +39 0131 750811
- e-mail: privacy@gualapack.com

In addition, you have the right to lodge a complaint with the Data Protection Authority (www.garanteprivacy.it) if you feel that your rights under the GDPR have been violated.



Consent Form

Having read and understood the Privacy Policy Notice above for the processing of personal data by the Controller

I Agree <input type="checkbox"/>	I do not Agree <input type="checkbox"/>
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to the processing of my personal data to carry out promotional initiatives and sending direct marketing communications, newsletters, as well as carrying out market research, on products and services of the Controller or of its subsidiaries, parent or affiliated/associated companies, by e-mail, text message, or similar, and/or by means of postal service or telephone calls with an operator (marketing purposes).

Legal Notice Update

This Privacy Policy is valid from January 2025 and is subject to changes, corrections and updates in compliance with regulatory or regulatory provisions. Hence, we invite you to check the latest version available on our website regularly.

Additional information on local processing and privacy laws

This Privacy Policy for Customers and Suppliers has been conceived according to the EU and Italian data protection legislation, as Gualapack's HQ has its registered office in Italy. For further information on the processing of Personal Data by Gualapack according to the privacy protection laws in force in a state other than Italy, please contact privacy@gualapack.com.