

## NOTICE AND CONSENT ON THE PROCESSING OF PERSONAL DATA

**OMG srl OFFICINE MECCANICHE**, Sole Proprietorship, Strada Provinciale FELETTTO - AGLIE 'Km 2.225 - 10080 LUSIGLIE' (Turin) (hereinafter "**OMG**", the "**Company**" and/or the "**Data Controller**"), as Data Controller pursuant to Legislative Decree 196/2003 and subsequent amendments (Privacy Code) and Regulation (EU) 2016/679,(GDPR) acting through its *pro tempore* legal administrator

As described in the following sections, your data will be processed for:

- provision and management of the contractual relationship;
- promotional and marketing activities.

### **A) Provision and management of the contractual relationship**

The data collected during the product request, pre-contractual activities, the signing of the contract, the approval of the request, the execution of the contractual relationship with OMG Srl, the implementation of the contractually agreed services/operations will be processed for strictly related and instrumental purposes. the management of relations with customers, the execution of the pre-contractual and/or contractual relationship, as well as compliance with regulatory obligations imposed by the Authorities under the law.

The data collected for this purpose may also be processed to promote the services and products to the interested parties who have already used them, by sending periodic information and promotional communications by e-mail; the legal basis of the processing is the legitimate interest of the Data Controller to update those subjects who have already used the services and/or products on offers relating to similar services or products in compliance with the provisions of article 130, paragraph 4, of the Privacy Code, without prejudice to the right of the data subjects to object to the processing at any time.

We inform that you always have the possibility to object at any time to this processing in an easy and free way.

The provision of the data required for the purposes referred to in this point is necessary for the signing of the contract, and in case of refusal to supply them, it will not be possible to carry out the request, as the activities necessary for the signing and execution of the contract cannot be carried out.

The data provided will be processed until the end of the contract and, in any case, up to ten years from the date of the last registration (pursuant to Article 2220 of the Civil Code), except for different needs related to the defence of rights in court.

### **B) Promotion and marketing**

**Furthermore, on the basis of your consent, your personal data will be processed for the following purposes:**

#### **1) receive promotions regarding the various types of products offered by OMG Srl**

This processing includes traditional and non-conventional marketing activities, commercial information, sending of advertising material or carrying out market research, direct sales activities, or interactive commercial communications on products, services, and other activities of the Data Controller, and refers to any product already active at the time of subscription or activated in the future.

The provision of data is optional and failure to consent to such processing does not affect the performance of the activities described above.

You have the right to revoke at any time the consent previously given with reference to the purposes referred to in this paragraph through the methods indicated in letter F).

The data provided will be processed for twenty-four months from their date of delivery and will then be either anonymised or deleted.

**2) receive commercial promotions related to products and services offered by other companies.**

This processing includes the communication of personal data to OMG companies for traditional and non-conventional marketing purposes, commercial information, sending of advertising material, or carrying out of market research, direct sales activities, or interactive commercial communications on products, services, and other activities regarding products of third parties.

The provision of data is optional and failure to consent to such processing does not affect the performance of the activities described above.

You have the right to revoke at any time the consent previously given with reference to the purposes referred to in this paragraph through the methods indicated in letter F).

**C) Recipients of Personal Data**

For the different purposes described so far, the Data Controller may communicate your data, in Italy or within and/or outside the European Union, always in compliance with the rights and guarantees provided for by current legislation, to:

- companies belonging to the OMG Group or any parents, subsidiaries, or associates;
  - subjects that perform data acquisition and processing services necessary for the execution of the orders received from customers;
  - subjects providing services for the management of the OMG information system and telecommunications networks (including email);
  - subjects that carry out transmission, envelopment, transfer, and sorting of communications with the data subject;
  - subjects that carry out archival documentation and data entry activities;
  - subjects that provide customer assistance (e.g. call centres, customer services, etc.);
  - firms or companies in the context of assistance and consultancy relationships;
  - subjects that carry out checks, audits, and certification of the activities carried out by OMG, also to satisfy customer interests;
  - employees of OMG or of OMG group companies, who have been specifically appointed in accordance with the law.
- Where requested, the parties indicated will be suitably appointed as Data Supervisors in the forms required by the legislation in force.

**D) Processing methods**

The processing of data for each of the aforementioned purposes will take place using automated and online methods, and, in particular, by postal or electronic mail, and any other computer channel (e.g. websites, mobile apps) and in paper form.

**E) Data Controller**

For any direct contact - formal and urgent, you may contact the Data Controller at the following email address:

[privacy@omgsrl.com](mailto:privacy@omgsrl.com)

**F) Rights that may be exercised**

In relation to the processing of personal data listed above you are entitled to exercise your rights under Art. 15 and following of the Third Chapter of GDPR and of Art. 7 of the Privacy Code, before OMG Srl as the Data Controller, with registered office in Lusigliè, Strada Provinciale Feletto Agliè KM 2.225 -, at the following addresses: Email: [privacy@omgsrl.com](mailto:privacy@omgsrl.com) Certified email address: [privacyomgsrl@legalmail.it](mailto:privacyomgsrl@legalmail.it)

In particular, you can make the following requests:

- Request for access to your personal information. This instance allows you to obtain a copy of the personal information processed and to verify the correct processing.
- Request for rectification of the data processed. After this request you may change any incomplete or incorrect information.

- Request for cancellation of personal information. By means of this request, if there are no valid reasons to continue with the processing, you will be entitled to request to delete or remove the Data. The right to cancel or remove is also recognised in the event that you have exercised the right to object to this data processing (see below).

- You have the right to object at any time to the processing of your data if, in reference to your particular and specific situation, you should encounter a reason for unlawfulness in the processing.

You are also entitled to object to the processing if your data are processed for marketing purposes, including profiling.

- Request to limit the processing of your personal data. After this request you will have the right to reduce the data processing, including the suspension of processing pending verification of its lawfulness.

- Request for data transfer. By submitting this request you will be entitled, if technically possible, to obtain direct transmission of your data from one Data Controller to another.

If you wish to review, verify, correct, or request the deletion of your personal information, object to the processing of your personal data, or request the transfer of a copy of your personal information to another party, you must contact your direct supervisor in writing.

The Data Controller provides feedback on your requests within one month of receipt, subject to a two-month extension, taking into account their complexity and number; after the deadline you have the right to file a complaint with the Italian Data Protection Authority for the Protection of Personal Data, based in Piazza Venezia, 11 IT-00187 Rome, in the forms and ways provided by the legislation in force.

#### **G) Storage and deletion of data**

The data is stored only for the time necessary to provide the requested service and for legal and essential business purposes, such as the maintenance of services, the adoption of business decisions based on data on new features and offers, compliance with our legal obligations, and dispute resolution.

We store some personal data for the entire duration of the contract.

If requested, we will delete or anonymise your personal information so that it no longer identifies you, unless the law allows it or does not require the retention of certain personal data, including in circumstances similar to the following:

- in the event that we are asked to keep personal data in order to fulfil our legal, tax, auditing, and accounting obligations, we will store the personal data necessary for the period required by current legislation and/or
- where necessary for our legitimate business interests such as fraud prevention or to maintain the safety of our customers.

#### **H) Data protection**

OMG adopts all appropriate technical and organisational measures to protect the security of personal data collected. OMG has implemented several procedures, in order to avoid unauthorised access and unnecessary storage of personal data in the systems.

#### **I) Changes to the Privacy Policy**

OMG may occasionally make changes to this Notice.

In the event of any substantial changes, the Data Controller will provide a clearly visible notice, depending on the circumstances, for example by viewing it on the website or by sending a specific email.

Therefore, be sure to read these notices carefully.