

**Disclosure for digital services**  
**Declaration of the Data Controller to the Data Subject**  
**Articles 13 and 14 of the EU Privacy Regulations - GDPR No. 679 dated 2016**

Dear Sirs,

We hereby intend, in accordance with principle of transparency, to place you in the position to be aware of our intentions regarding your personal data (hereinafter, for the sake of brevity, also just data) for the purpose of permitting you to assess the consequences, to be able access or refuse the processing and check the sequence of your data.

A number of summary specifications follow:

Personal data, in accordance with the Regulations is any information regarding an identified or identifiable individual («data subject»); the individual who can be identified, directly or indirectly, with particular reference to an identifying reference such as the name, an identification number, data relating to the location, an on-line identification reference or one or more characteristic elements of their physical, physiological, genetic, psychic, economic, cultural or social identity, is considered identifiable.

Processing is understood to be any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- The data controller, or rather the corporate body which determines the purposes and the means for the processing of your data, is LECHLER S.p.A., with headquarters in Via Cecilio 17, Como (CO), Italy.
- The Privacy Department, or rather the company units which aid the Data Controller in the handling of the Privacy. The data subject may, at any time, contact this department using the following e-mail account: [dipartimentoprivacy@lechler.it](mailto:dipartimentoprivacy@lechler.it) for the purposes of exercising their rights (explained below).
- Purpose of data processing

The data which you will make available to us will be processed by ourselves:

- in relation to the periodic sending of newsletters and communications on the basis of the interests indicated by the user, in complete observance of the principles included in Article 5 of the EU Regulations;
- for the generation of Discount coupons to be used care of Lechler dealers;
- for the identification of the areas of greatest interest for the user so as to define the visibility of the digital services offered within the Lechler information system;
- for the creation of a profile within the Lechler Blogs which permits one to comment on the posts;
- for the profiling of the geographic areas, the interests and the record files of the users for the purpose of improving and targeting the services offered within the information systems, the web applications and the software distributed by Lechler;
- for the direct communication via ordinary mail or telephone of information and materials (if explicitly requested);
- for the prompt solution of the support and assistance requests.

### **Data processing methods**

The data which you will make available to us will be processed by means of electronic processing or in hardcopy form by parties specifically appointed by the data controller. Both the information systems and the hardcopy mediums are handled and kept in such a manner so as to ensure the security and confidentiality of said data. The data will not be transferred outside the EU.

### **Legal basis of the processing**

Your consent, freely expressed by ticking the corresponding flag in each section of the website where the input of personal data is requested, is the legal basis of the processing.

Data exists without which it is not possible to handle the aspects indicated in the section entitled "Purpose of data processing".

Our company considers the following data identifying individuals to be fundamental data and in other words data whose conferral is indispensable for the management of the company newsletter: record file data (name, surname, residence address), telephone number, e-mail/ certified e-mail address, information linked to the job of the user such as qualifications, role and company and the information linked to the specific interests vis-à-vis Lechler S.p.A.

Should you fail to provide us with the data which we consider to be fundamental we will not be able to include you in the company newsletter list.

By contrast, our Company considers any data other than that described above to be non-fundamental data. The failure to confer this data will not impede the handling of the company newsletter.

### **Sphere of awareness of your data - internal Company flow**

The following categories of parties may become aware of your data in their capacity as individuals in charge of processing:

- communications unit;
- marketing secretariat unit;
- sales office staff;
- marketing office staff;
- Information & Technology staff;
- customer service staff.

### **Scope of knowledge of your data - external flow**

Lechler reserves the right to transfer data also outside the EU, but always in countries to which there is an adequacy decision by the Commission which certifies an adequate level of protection.

### **Retention period**

The personal data made available by yourselves will be processed by ourselves for the period necessary for the fulfilment of the purposes as described above; in the event of request for cancellation, this data will be completely eliminated by ourselves.

### **Rights**

Your rights as expressed in Section III of the European Regulation are illustrated below: right of access (Article 15 of the EU Regulation), right of adjustment (Article 16 of the EU Regulation), right to cancellation (Article 17 of the EU Regulation), right of limitation to the processing (Article 18 of the EU Regulation), right to the portability of the data (Article 20 of the EU Regulation), right of



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opposition (Article 21 of the EU Regulation). At any moment you will in any event have the possibility to request the adjustment or supplementing of your data, you may revoke any consent possibly given; you may also lodge a complaint with the Data Protection Authority.

Yours sincerely

Lechler S.p.A.