

TO ALL CUSTOMERS

**SUBJECT:** Disclosure pursuant to and by effect of Arts. 13 and 14 of Regulation (EU) 2016/679 (hereinafter, the "GDPR") and the applicable national legislation concerning the protection of personal data.

In view of your status as "Controller" and "Interested Party", namely the subject to which the processed data refers and/or which you are responsible for managing, we hereby wish to inform you on the essential matters concerning the processing procedures carried out.

#### **Purpose of data processing.**

The personal data is collected and processed for the following purposes:

1. to fulfil all provisions imposed by legislative obligations and tax and fiscal regulations deriving from the undertaking of business activities, and by the provisions in force on anti-money laundering;
2. to establish and execute the contractual relationships in force, as well as for pre- and after-sales assistance;
3. to perform the operations strictly related and instrumental to the beginning of the aforementioned relationships, including the acquisition of preliminary information for the stipulation of the contract;
4. to manage relations with the Customer with regard to administration, accounting, orders, shipments, invoicing, services and management of any disputes;
5. to measure the degree of customer satisfaction and to draw up statistics for internal use;
6. in particular, to send advertising or direct marketing materials, perform market surveys or surveys for commercial communication both through automated contact methods (electronic mail, other remote communication systems based on communication networks such as, by way of example: SMS, MMS, WhatsApp) and traditional methods (postal mail) by the Data Controllers, in full compliance with Regulation (EU) 2016/679 (GDPR), the applicable national legislation and the Regulation issued by the (Italian) Data Protection Authority dated 4 July 2013 "Guidelines on marketing and against spam".

Moreover, such data will be processed in accordance with the principles of correctness, lawfulness, transparency and protection of your privacy and rights.

The purposes relating to the contract, provision of services, commercial or other disputes and promotional matters concern the processing of personal data of the Customer alone. The Customer's personal data will be processed for the entire duration of the contractual relations in force and also subsequently to fulfil all legal obligations, as well as for future commercial purposes in compliance with the applicable regulations.

#### **Anti-money laundering and anti-terrorism.**

The conferral of the data required by anti-money laundering and anti-terrorism regulations is mandatory. Any refusal thereof precludes the provision of the professional service requested and may cause the operation to be reported to the competent supervisory body. In this regard, we point out that the processing of personal data related to anti-money laundering obligations shall occur in accordance with the specific execution methods imposed on non-financial operators

by the regulations on the identification and storage of information as stated in Art. 3, Par. 2, of (Italian) Legislative Decree no. 56/2004 and adopted with Ministerial Decree no. 143/2006. Other information could also be collected from public sources in order to fulfil the obligations specified in Legislative Decree no. 231/2007.

#### **Methods of data processing.**

The processing of personal data for the above-mentioned purposes will occur through automated means, on electronic or magnetic supports, and also non-automated means, in printed form, in accordance with the privacy and security rules established by the law, the resulting regulations and internal provisions.

#### **Place of data processing.**

The data is currently processed and stored at the head office located in Via L. Zanussi, 8 - 33070 Brugnera (PN), Italy. In addition, the data is processed – on behalf of the undersigned – by professionals and/or companies entrusted to perform technical, development, management and administrative/accounting activities, as well as at third parties that also provide technical and IT services, appointed as Data Processors, the list of which is available upon request to the Controller.

#### **Compulsory or optional nature of the data conferral.**

Some data is indispensable to establish the contractual relationship or for its execution, while other data may just be considered ancillary for the same purposes. Conferral of data to the undersigned is compulsory only for data which is subject to a regulatory or contractual obligation in this regard.

#### **Consequences of the refusal to confer personal data.**

If the data conferral is compulsory by law or by contract, any refusal thereof implies that the Supplier will be unable to execute or continue to fulfil contractual obligations, as this would constitute unlawful processing. If there is no legal obligation to confer data, any refusal thereof would not lead to any of the above effects, but would nonetheless prevent the execution of the ancillary operations.

#### **Data communication.**

Without prejudice to the communication and disclosure effected in order to fulfil legal obligations, all data collected and processed can be disclosed in Italy and/or abroad to:

- Professionals and consultants, consulting firms, factoring companies, banks, credit recovery companies, credit insurance companies, commercial information companies and companies operating in the transport sector;
- Public and private bodies, also following inspections or verifications, such as, for example: The financial administration, tax inspectors, judicial authorities, the Italian Foreign Exchange Office, the Labour Inspectorate, the Local Health Authority (ASL), social security bodies, the National Assistance Board for Commercial Agents and Representatives (ENASARCO), the Chamber of Commerce, etc.;
- Other companies of the Group, also resident abroad (see next item);
- Subjects that can access your data pursuant to the law;

Sensitive data, albeit processed in entirely anonymous form, will not be subject to any form of disclosure and/or transfer, except for fulfilling the purposes specified in this document and upon written authorisation on your part.

#### **Transfer of personal data abroad.**

Your data may be communicated and/or transmitted abroad, also to non-European third countries, exclusively to fulfil the obligations deriving from the service contract and/or mandate of which you are the interested party or to fulfil, before the stipulation of the contract, your specific requests, or to stipulate and execute a contract in your favour in full compliance

with Arts. 44 and subsequent articles of the GDPR, or for strictly technical reasons linked to the structure of the company's IT system and/or the application of technical and organisational security measures deemed suitable by the Controller (Art. 32 of the GDPR).

#### **Duration of data storage.**

The data you provide will be stored in our archives according to the following parameters:

- For activities relating to administration, accounting, orders, management of quotations and of the entire production flow, assistance and maintenance, shipment, invoicing, services, management of any disputes: 10 years, as stated by law according to Art. 2220 of the (Italian) Civil Code, without prejudice to any delayed payment of the amounts due that justify the extension of said term;
- For the purposes stated under item 5 above, the storage will last until the expiry of the contract and/or the conclusion of the commercial supply relationship;
- For marketing purposes (item 6): 24 months.

#### **Rights of the data subject.**

The data subject may exercise the relevant rights, within the limits and at the conditions thereof, stated in Arts. 15 to 22 of the GDPR and specified in the national regulations in force. If the data subject consents to the data processing, as requested by L&S ITALIA S.p.A., in any form whatsoever, said consent may be withdrawn at any time, without prejudice to the compulsory fulfilments specified in the applicable law at the time the withdrawal is requested, by contacting the Controller at the numbers/addresses shown below.

#### **Right to lodge complaints.**

If the data subject believes that the data has been processed in breach of the provisions of the GDPR, the same data subject is entitled to lodge a complaint with L&S ITALIA S.p.A. as stated under Art. 77 of the GDPR, or to take any legal action deemed necessary (Art. 79 of the GDPR).

#### **Data Controller.**

The Data Controller, which you may contact to exercise the rights stated under Arts. 15 to 22 of the GDPR and in the applicable regulations, is L&S ITALIA S.p.A., with head office in Via L. Zanussi, 8 - 33070 Brugnera (PN), Italy. The list of Data Processors is available on request at the secretary's office of the company. The above-mentioned rights can also be exercised by sending a written communication to the following email address: [info@ls-light.com](mailto:info@ls-light.com).



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