OUR CORPORATE PRIVACY POLICY

This privacy policy explains how our organization uses personal data you provide us. The following information is provided only for the website <u>https://www.pebospa.com/</u> and not also for third-party websites accessible through hyperlinks (links) contained in the Website.

WHO IS THE CONTROLLER OF PERSONAL DATA?

PEBO s.p.a. is the data controller, legal office based in Urbania (PU), via Giuseppe Garibaldi, n. 1 and operational office in Sestino (AR), località Piego, VAT NUMBER IT 01233740511, email <u>info@pebospa.com</u>, LEGAL p.e.c. <u>pebo@legal-pec.it</u>. in the person of the legal representative *pro tempore*, which is a company belonging to the Group of companies System Group, headed by the company HB Boscarini s.p.a. which represents the holding company of the group (email of the group <u>privacy.systemgroup@tubi.net</u>).

WHICH PERSONAL DATA DO WE COLLECT?

When we speak of "personal data" in this Policy, we mean data relating to the data subject who may be a visitor, a customer or a potential customer. Personal data includes name, e-mail address, telephone number, company, province and further information contained in the message.

We process data voluntarily provided by the user, through the filling of the forms in some sections of the Site or by sending e-mail messages to the e-mail addresses indicated or accessible through links on the Site. The purposes are related to the provision of services offered through the Site.

HOW AND WHY WE USE YOUR PERSONAL DATA?

the personal data provided by the data subject will be processed for the following purposes:

- A. **Respond and manage your requests.** In relation to the data provided by filling out the form "*Request information*", in order to respond to your requests for information, quote, or other nature contained in the text of the message. One of our employees will contact you in order to reply to the requests submitted or organize the meeting. Without their treatment we cannot respond to your requests. In these cases, the processing of your personal data is necessary to implement pre-contractual measures.
- B. Subscription to the newsletter to send you periodic information by e-mail.

C. Marketing

c.1 To send you updates on news and commercial offers of our or third parties products and services. To invite you to attend events, conduct market research or other commercial and customer satisfaction initiatives either through communication channels such as telephone calls from an operator or through automated communication tools such as emails, chats, messages (SMS and other instant messages) and other means of communication.

c.2 To share your personal data with other companies in our group and/or commercial partners belonging to our sales network. To send marketing communications and for other commercial initiatives such as those indicated at point c.1.

Your data processing for subscription to the newsletter and for marketing purposes is not mandatory. In these cases your data may be processed with your express consent, completely optional, revocable at any time without any consequence.

HOW LONG WE KEEP YOUR DATA SAVED?

The processed data will be kept for a limited period of time. At the end of the processing, the data will be deleted or anonymized. The storage period is different depending on the purpose of the treatment, in particular:

- The data provided by sending e-mail messages or filling out the contact forms on the site will be kept for the time necessary to provide feedback;
- for marketing and sending newsletters will be processed until it decides to unsubscribe from the service and in any case for a period not exceeding 24 months from the date on which the consent is given or renewed.

PROCESSING METHODS

Personal data are processed with automated tools for the time necessary to achieve the purposes for which they were collected. Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

TO WHOM WE COMMUNICATE YOUR DATA?

Your personal data are communicated:

- to collaborators and employees authorized and instructed by the Data Controller in the context of their skills and duties;
- to providers of services offered through the Site or related to its operation who act as data processors (e.g. web hosting service, newsletter service);
- to HB Servizi S.r.l. for the performance of secretarial services, communications and marketing offices, in particular to the response of requests received from users, to the organization and development of initiatives and marketing campaigns, as data controller;
- If you authorize us, we will share your data with other companies in our group and/or commercial partners belonging to our sales network for sending newsletters, marketing communications and for other commercial initiatives such as those indicated in point C).

Apart from the cases described above, personal data will not be disclosed, disseminated, transferred or otherwise transferred to third parties for illicit purposes or not related to the purposes described above and, in any case, without making appropriate information to data subjects and acquiring their consent, if required by law.

It is without prejudice to any communication of data at the request of the Judicial or Public Security Authority, in the manner and in the cases provided by law.

TRANSFER OF YOUR DATA TO THIRD COUNTRIES

Your personal data may be transferred abroad, even in non-EU countries, after verification of the standard contractual clauses approved by the European Commission (art.46 GDPR) or the binding rules for the company (art.47 GDPR), or, in the absence thereof, by virtue of one of the derogatory measures referred to in art. 49 GDPR.

YOUR DATA PROTECTION RIGHTS

Our company wishes to ensure that you are fully aware of all your data protection rights. Each user has the right to:

The right of access – You have the right to request from our company copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that our company correct any information that you believe to be inaccurate. You also have the right to request our company to complete information that you believe is incomplete. **The right to cancellation** or restriction of processing - You have the right to request that our company delete your personal data.

The right to restrict processing – You have the right to request that our company limits the processing of your personal data in the cases indicated in art.18 GDPR;

The right to object to processing – You have the right to object to the processing of your personal data by our company for marketing and profiling purposes;

The right to data portability – You have the right to request that our company transfer the data we have collected to another organization, or directly to you, in the cases indicated by art. 20 GDPR.

If you make a request, we have a month to answer you. If you wish to exercise one of these rights, please contact us at our email *privacy.systemgroup@tubi.net*

HOW TO CONTACT US

If you have any questions about our privacy policy, the data we hold about you, or if you wish to exercise any of your data protection rights, please do not hesitate to contact us.

Write to *privacy.systemgroup@tubi.net*

HOW TO CONTACT THE COMPETENT AUTHORITY

If you wish to report a complaint or if you believe that our company has not addressed your concern satisfactorily, you can contact the Guarantor's office at the following link <u>https://www.garanteprivacy.it/home/docweb/-/docweb-display/docweb/4535524</u>.

CHANGES TO OUR PRIVACY POLICY

Our company keeps your privacy policy under regular control and places any updates on this web page.