

Information for the processing of customers personal data pursuant to section 13 of Regulation (EU) 2016/679

This privacy information describes the procedures used by VSI Controls S.r.l. (the “**Company**”) to gather, store and use your personal data, including the personal features and bank details collected at the beginning and during the contractual relationship.

Your personal data will be processed in compliance with the principles of fairness, lawfulness and transparency.

Data controller, data processor

VSI Controls S.r.l., based in Via Antonio Locatelli, 5 - 20124 Milan (MI), is the data controller of your personal data.

You may contact the data controller through the data processor, sending a request to the e-mail address: privacy@vsicontrols.com

Purposes of the processing

Your personal data may be processed for the following purposes:

- a) for managing the contractual relationship and for the provision of services;
- b) for the establishment, management and termination of the contractual and commercial relationship;
- c) for the fulfilment of accounting and tax obligations;
- d) for the fulfilment of law obligations (for example: counter-terrorism or anti-money laundering controls; etc.);
- e) for financial and accounting audits;
- f) for managing possible litigations;
- g) for the provision, support, updating and information regarding the services provided.

Methods and place of processing

Your data will be processed with manual, automated, paper, IT and electronic methods aimed at storing, managing or transmitting data in an appropriate manner to ensure the security and confidentiality of data pursuant to the provisions of section 32 of Regulation (EU) 2016/679 (“**Regulation**”).

Processed data are stored at the Company’s premises and at PetrolValves S.p.A.’s premises.

We will process your personal data only if necessary to attain the purposes described above. Personal data not necessary for the attainment of these purposes will be deleted by our personnel, acting under the authority of the controller or of the processor.

Data Storage

Your personal data will be stored for the length of time related to the current commercial relationship with the Company and, subsequently, for the length of time establish by the legislation, applicable to the aforementioned relationship; at the end of that period, your personal data will be deleted or made anonymous. In particular, your personal data will be stored for a period of maximum 10 years in compliance with articles 2220 e 2948 of the civil code and with article 22 of D.P.R. 29 September 1973, n.600.

Legal basis for processing and supplying data

The processing of your personal data for the purposes mentioned above, in the preceding paragraph a), b), c), d), e), f), and g), is based on the need of executing a contract and of fulfilling a law obligation. Therefore, the supply of data does not require your consent.

The supply of your personal data for the purposes mentioned above, in the preceding paragraph a), b), c), d), e), f), and g), is mandatory. Any refusal to supply the data requested or their inaccuracy may lead to the impossibility of establishing and/or continuing the commercial relationship with the Company.

Disclosure and communication of the data

Your personal data will not be disclosed unless it is necessary to fulfill the obligations provided for by the law or regulations and/or to perform terms of the existing contract with the Company.

Your personal data will be processed by persons in the company in their capacity as officers acting under the authority of the controller or of the processor and by external subjects who hold specific positions mainly of an administrative or accounting nature on behalf of the Company, who will act as data processor. The Company may also process your data through external companies, which will act as data managers.

Your personal data may also be processed by the following people: subjects who are responsible for the maintenance and development of IT system, for the duration of the service execution; outsourcers; external consultants working for the Company or for either Italian or foreign subsidiaries (including extra UE countries, in particular the following countries: **Singapore, Norway, Kazakhstan, United States of America, United Kingdom, Australia, Brasil**), for the purposes mentioned above, in their capacity of data processor.

The list of such officers is constantly updated and is available at the premises of the Company at your request.

Rights provided by the Regulations

Pursuant to the Regulations, you have the right to obtain:

- confirmation as whether or not your personal data are being processed, and, inter alia, access to the following information:
 - a) the purposes of the processing;
 - b) the categories of personal data concerned;
 - c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
 - d) the expected storage period for the personal data, or, if not possible, the criteria used to determine that period (section 15 of Regulation);
- amendment of your personal data, as well as, having incomplete personal data completed (section 15 of Regulation);
- deletion of your personal data in the cases provided for by current legislation;
- restriction of processing your personal data in the cases provided for by current legislation (section 18 of Regulation);
- right of data portability, that is the right to receive your personal data in a structured, commonly used and machine-readable format (section 20 of Regulation).

In order to exercise the rights referred above, you may contact the data manager. The data manager details and the officer to be contacted will be communicated sending your request to the following e-mail address: privacy@vsicontrols.com

Last, you have the right to file a complaint with national supervisory authority (Garante per la protezione dei dati personali, Piazza di Montecitorio n. 121, 00186, Roma (RM)).