

PRIVACY POLICY STATEMENT FOR VISITORS OF LATI WEBSITES
Pursuant to art. 13 GDPR EU 2016/679
(Re. PRV2021070601R3-EN)

LATI Industria Termoplastici S.p.A. (hereinafter, LATI) herewith informs you about the purpose and method for the processing of your personal data and about your rights according to the Regulation of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of personal data ("GDPR") collected while browsing the websites managed by LATI.

1. Types of data

The data referred to in this statement is personal data collected automatically while browsing the www.lati.com website and other related websites, or the data provided voluntarily by the Data Subject.

We inform you that "personal data" means "any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person."

The data collected can be grouped into the following categories:

A) "Common" personal data

The website collects data provided voluntarily by the visitor such as, depending on the situation, the personal information and contact details (name, family name, address, telephone number, date of birth, e-mail address ...) necessary to accept applications for participation in events and promotional initiatives organised by the Data Controller or to send promotional communications such as, by way of example, newsletters, invitations to events, invitations to webinars, emails containing articles related to our engineering materials and their applications, email containing documents relating to the products and services in which the visitor has shown interest or relating to the visitor's business.

The website also allow visitors to submit their CVs for personnel recruitment purposes. The processing will not involve sensitive data, pursuant to art. 9 par. 1 ("special categories of personal data").

The candidate, therefore, will not be required to provide data pertaining to "special categories", according to art. 9 GDPR, i.e. "sensitive data" revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. This data, if any, contained in the CV or in other documents sent to us (including data revealing, by way of example, one's state of health, or pertaining to protected categories) will be immediately erased.

Persons belonging to a protected category are therefore invited to send their CVs only by ordinary mail to the address of the Data Controller, together with the following signed declaration of consent: "Pursuant to art. 9 of Reg. 2016/679, I authorise LATI Industria Termoplastici S.p.A. to process my sensitive data for the purposes specified in this statement."

B) Navigation data

Like all websites, this site also makes use of log files storing information that is collected in an automated manner from the website visitors. The information collected may be the following:

- IP address;
- type of browser and operating system of the device used for connecting to the website;

- date and time of visit;
- website pages visited;
- visitor's referral and exit page.

C) Cookie policy

This site uses cookies, i.e. text files recorded on the user's device or allowing access to information therein. Cookies are used for storing information on the visitors' preferences, verifying the correct operation of the site and improving its functionality by customising the content of the pages based on the type of browser used, or simplifying browsing by automating the procedures (e.g. login, site language) and finally analysing the way the website is used by visitors.

For more details, please refer to the specific "[Cookie Policy](#)" statement.

2. Legal basis for the processing

The legal basis of the processing is the legitimate interest of the Data Controller to promote relations and business relationships with its business contacts as well as the consent of the Data Subject, if given.

3. Data processing purpose

- The navigation data is processed in an automated manner and collected in an exclusively aggregated form in order to check the performance of the site, to undertake anonymous statistical surveys on its use as well as for security reasons in order to prevent any damage or illegal conduct.
- The personal data collected by the Data Controller – or by third parties designated by the Data Controller for personnel recruitment procedures – is processed and used to meet the requests of the Data Subjects and, more precisely, to verify the conditions for recruitment and/or the start of a working relationship.
- The personal data collected in relation to applications for participation in events and promotional initiatives organised by the Data Controller is processed and used exclusively to meet the requests of the Data Subjects.
- The data collected in order to answer questions or to have access to documents will be used for the provision of the requested service or for contacting the applicant in order to gain further insight into the related issues.
- The data provided for sending e-mails is intended as voluntarily provided by the user at the time of the request for the delivery of the service and will be used exclusively for the provision of the service requested.
- The contact details may be used for marketing purposes related to the promotion and sale of Lati products and services. The lawfulness of the processing is based, therefore, on the consent manifestly expressed by the Data Subject by flagging the relevant form. In particular, the activities in question are carried out using the "Inbound Marketing" method which consists of a set of digital strategies aimed at stimulating the commercial interest of the subjects contacted by showing and sending content about products and services that may meet their specific interest. To this end, promotional communications may be made, such as, for example, newsletters, invitations to events, invitations to webinars, emails containing articles related to our engineering materials and their applications, email containing documents relating to the products and services in which the visitor has shown interest or relating to the visitor's business. All this with the simultaneous storage of the pages visited, for statistical purposes.

If the processing of personal data is intended for a purpose other than that for which they were collected, the Data Controller will provide the data subject with information regarding this different purpose and any other relevant information before such further processing.

4. Data processing method

The processing will take place using IT and / or telematic tools, with organisational methods and principles strictly related to the aforementioned purpose.

In particular, for the marketing activity carried out according to the aforementioned "Inbound Marketing" method, the "Hubspot" digital platform will be used, consisting of an all-in-one marketing automation software.

5. Data processing location

The navigation data collected from the website is processed at the company hosting the website itself, located in Italy. The personal data provided voluntarily by the visitor is processed at the Data Controller's head office or hosted on the Data Processor "Hubspot, Inc." infrastructure in the European Union. CV data is hosted on the Data Processor "Interviewweb S.r.l." infrastructure in the European Union.

6. Mandatory or optional provision of personal data - consequences of denial

The voluntary provision of common personal data related to services that require such data is optional, yet necessary for the delivery of these services. Therefore, the denial to provide this data results in the impossibility of obtaining the desired services.

7. Disclosure of personal data

The navigation data collected from the website will not be disclosed to third parties for any reason, unless it is requested by a judicial authority and only in the cases provided for by law.

The data relating to the organisation of events might be communicated to the subjects involved in the management of the same.

In addition to the Data Controller, certain categories of persons involved in the organisation of the site may have access to personal data (administrative, commercial and marketing staff, legal advisors, system administrators) or external entities (such as technical service providers, mail services, hosting service providers, IT companies, communication agencies). If necessary, these entities are appointed as Data Processors. The updated list of Data Processors can be requested from the Data Controller at any time.

8. Transfer of data abroad

This site does not provide for the sharing of personal data outside the European Union.

9. Data storage period

- The log files for access to the website are kept for 2 weeks.
- The data collected in order to assess the conditions for recruitment and/or the start of a working relationship will be stored by the Data Controller for a maximum of two years after their collection unless a working or employment relationship is established.
- The personal data collected in relation to applications for participation in events and promotional initiatives organised by the Data Controller will be retained for the period strictly necessary to achieve the purposes for which they were collected and in any case for a maximum period of one year.
- The data provided for the purposes of sending e-mails is considered as provided voluntarily by the user at the time of the request for service and will only be used for the time necessary to deliver the service requested and in any case for a maximum period of one year from the last contact.
- Personal Data collected for purposes related to the legitimate interest of the Data Controller will be retained until the satisfaction of this interest. The user can obtain further information regarding the legitimate interest pursued by the Owner by consulting the relevant sections of this statement or by contacting the Data Controller.

10. Rights of the Data Subject

In relation to his personal data, the Data Subject may exercise the rights guaranteed under art. 15 GDPR EU 2016/679 on the protection of personal data processing. The Data Subject has the right to obtain confirmation of the existence of personal data concerning him and its communication in an intelligible form.

The Data Subject also has the right to obtain information on the origin of the data, on the data processing purpose and method, on the Data Controller and its Representative, on the entities to which the data may be disclosed.

The Data Subject has the right to have his personal data rectified, supplemented, updated, as well as to obtain their erasure or transformation into anonymous form.

The Data Subject can obtain at any time the termination of any information communications using the "Unsubscribe" function on the e-mails received.

The Data Subject can request the termination of any communication at any time by contacting the Data Controller through an e-mail message.

11. Data Controller and Data Protection Officer

The Data Controller is LATI Industria Termoplastici S.p.A., with registered office in Vedano Olona (VA) via F. Baracca 7. We inform you that pursuant to art. 37 GDPR, the Data Controller has designated a Data Protection Officer.

Data Processors

- Hubspot Inc. is designated as Data Processor, processing data on the behalf of the Data Controller as the manager of the digital platform hosting the data collected for marketing purposes.
- Interviewweb S.r.l. is designated as Data Processor, processing data on the behalf of the Data Controller as the manager of the digital platform hosting the CV data.

For any further information, please contact: privacy@it.lati.com.

Vedano Olona, 21 March 2023