

**PRIVACY POLICY**

*pursuant to Art. 13 of EU Regulation 679/2016 and the applicable privacy provisions*

***Agents - Consultants - Business brokers***

**Introduction**

Pursuant to and for the purposes of EU Regulation 679/2016 on the protection of personal data ("**Regulation**") and any other EU or national provision and/or regulation applicable to the protection of personal data, **ROSETTI MARINO S.P.A.**, Via Trieste 230 48122 Ravenna, Italy, e-mail: [privacy@rosetti.it](mailto:privacy@rosetti.it); tel. 0544878111, the Controller ("**Company**" or "**Controller**"), informs you that the personal data ("**Data**") provided by you during the establishment and/or execution of the agency agreement may be processed in accordance with the following.

**1. Purposes and legal basis for the processing**

The Controller collects and processes your personal data in the context of the pre-contractual, contractual and management phases of the agency agreement to which this information sheet is attached. The information processed is compulsory and necessary to properly execute the various stages of the contractual relationship between you and our Company (e.g. personal details, contact details, bank details, etc.). Below is an explanation of the purposes for which your Data is processed, as well as the legal basis underpinning the processing thereof.

The Company processes the Data for the following purposes:

- (i) the management and execution of the various stages of the pre-contractual and contractual relationship between you and our Company;
- (ii) the publication of your contact details in the relevant section of our website to enable users of our website (as well as clients and potential clients) to request any information related to the promotion and sale of our products in a given territory;
- (iii) purposes related to the management of your activity as an agent (e.g. administrative, accounting, tax requirements).

The legal basis for the processing of Data for the attainment of these purposes is the execution and proper management of the agreement entered into between you and the Company;

- (iv) the management of disputes in the event of breaches, claims, litigation, and/or settlements.

The legal basis for the processing of Data for the purposes mentioned above is the pursuit of a legitimate interest of the Company and/or third parties (e.g. in the event of disputes), which, based on the assessments made by the Company, does not prove to be prejudicial to your rights;

- (v) purposes connected with the fulfilment of obligations established by law, regulations, national and EU legislation and provisions issued by authorities empowered to do so by law.

The legal basis for the processing of Data processed for this purpose is the fulfilment of obligations provided for by law and applicable regulations.

For the pursuit of the above-mentioned purposes, our company will only process the so-called '*common*' Data (e.g. personal details, contact details, bank details). It should be noted that in the event that the contractual relationship with the Company is with a legal entity, this policy applies to the legal entity's representatives and contract managers.

**2. Nature of data provision and consequences of failure to provide data**

For the execution of the purposes listed in (i) to (iii) and (v), the processing of the Data is necessary and failure to



provide such Data will make it impossible to perform the agency agreement entered into between you and the Company and to comply with the legal obligations to which the Company is subject.

### **3. Categories of persons to whom the data may be disclosed**

The Data will not be disclosed; it may be communicated, for the above-mentioned purposes, to the following categories of persons: (i) companies belonging to the same corporate Group as our Company; (ii) persons, companies, associations or professional firms that provide assistance, consultancy, and services to our Company, with particular but not exclusive reference to accounting, administrative, legal, tax and financial matters; (iii) banking institutions for the disbursement of fees and insurance companies; (iv) persons/entities to whom the right to access the Data is granted by provisions of the law and secondary regulations or by provisions issued by authorities empowered to do so by law. Persons/entities belonging to the above categories will use the Data as autonomous controllers or Processors.

These persons/entities may be established in EU and non-EU countries. In particular, in the event that these persons/entities are established in non-EU countries, the Company shall adopt the measures provided for in the Regulation to legitimise the transfer of personal data to them.

The list of persons to whom the data is or may be disclosed, as well as an indication of the privacy measures adopted to legitimise the transfer of data to extra-EU entities, may be requested from the Company by contacting the addresses indicated in the 'Data subjects' rights' section.

The Data may also be brought to the attention of our personnel who will process it in their capacity as personnel in charge of data processing.

### **4. Data retention criteria**

The Data will be processed for the entire duration of the contractual relationship with our Company, after which it will be retained in compliance with the ordinary limitation periods set forth in the Italian Civil Code or specific provisions of law, for administrative purposes and/or to enforce or defend legitimate rights or interests, and it will be deleted when the purposes for which its collected no longer apply.

### **5. Data subjects' rights**

We inform you that, in the cases expressly provided for in the Regulation, you may exercise the rights set out in Art. 15 et seq. of the Regulation and precisely you may:

- (i) request confirmation that the Data is being processed and, if so, ask the Controller for access to information relating to such processing;
- (ii) request that incomplete or inaccurate Data is rectified;
- (iii) request the Controller to delete the Data;
- (iv) request the restriction of the processing;
- (v) request to receive, in a commonly used and machine-readable format, the Data concerning you or to obtain that such Data is transmitted directly to another controller, where technically feasible (so called '*data portability*').

In addition, you have the right to object, either wholly or partially, for legitimate reasons, to the processing of the Data that concerns you.

The aforementioned rights may be exercised by sending a request to the e-mail address: [privacy@rosetti.it](mailto:privacy@rosetti.it).

Finally, if you consider that the processing of the data provided violates the data protection legislation, you have the right to file a complaint with the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)).



## 6. Policy update

This policy was updated in January 2024.

### The Controller

#### Rosetti Marino S.p.A.

DocuSigned by:

*Ermanno Bellettini*

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Ermanno Bellettini

#### Rosetti Marino S.p.A.

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Share Capital: € 4,000,000.00 fully paid-in - Ravenna Economic and Administrative Index (REA) no. 1530 - Ravenna Companies' Register/Tax Code/VAT No. 00082100397