



Privacy Information for Suppliers

Provided pursuant to Art. 13 of EU Regulation No. 2016/679

National Molding Italia SRL is committed to protecting and safeguarding the privacy of its suppliers. This notice, provided to suppliers and individuals acting on behalf of legal entity suppliers, explains how our company is committed to protecting the information collected for the use of our products and telematic services. Specifically, this document describes how the collected data is used and managed: we hope to explain it clearly and understandably, but we will provide the necessary contact details for further questions.

In general, any information or personal data provided to National Molding Italia S.r.l. within the contractual relationship will be processed according to internationally recognized principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, integrity, and confidentiality.

This notice was drafted on March 22, 2024; occasionally, we may need to modify it due to changes in applicable legislation. To stay updated, we invite the Data Subject to regularly visit the website www.nationalmolding.it to take note of the most recent and updated version.

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(i) Data Controller

The Data Controller of personal data is National Molding Italia S.r.l., located in Trofarello, Via Terracini n. 16, VAT No. 07945330012, Registration with the Turin Companies Register No. TO – 933222. For matters related to personal data protection, the Data Controller can be contacted at: privacy@nationalmolding.it.

(ii) Purpose of Processing

National Molding Italia S.r.l. will process the Personal Data provided by suppliers only in the ways established in this Privacy Notice and in compliance with current legislative provisions. Personal data will be used for the following purposes:

- a. Fulfilment of contractual obligations: operations strictly connected and instrumental to the initiation of contractual relationships, including the acquisition of preliminary information for the conclusion of the Contract; management of relationships with the Supplier for administration, accounting, orders, shipments, invoicing, services, management of any disputes;
- b. Legitimate prevailing interest of the Data Controller: for checks and evaluations on the results and progress of the contractual relationship, as well as the risks associated with it (e.g., truthfulness of the data provided), to compile statistics on the services rendered;



- c. Legal obligations to which the Data Controller is subject: for legal obligations and/or provisions of public bodies, which require National Molding Italia S.r.l. to collect and/or further process certain types of personal data;

(iii) Legal Basis and Mandatory or Optional Nature of Processing

The legal bases used by National Molding Italia S.r.l. to process Personal Data, according to the purposes indicated in the previous Article 2, are as follows:

- Contract Art. 6 par. 2 lett. b Reg. EU 2016/679: in relation to the provision of the service/fulfilment of contractual obligations; processing for this purpose is necessary for the execution of the contract signed between National Molding Italia S.r.l. and the Supplier. The provision of Personal Data for this purpose is not mandatory, but without it, it will not be possible to execute the contract;
- Legitimate prevailing interest of the Data Controller Art. 6 par. 2 lett. f Reg. EU 2016/679: processing for this purpose is necessary to conduct checks and evaluations on the results and progress of the relationship, as well as the risks associated with it. The provision of Personal Data for this purpose is not mandatory, but without it, it will not be possible to execute the contract;
- Legal obligations Art. 6 par. 2 lett. c Reg. EU 2016/679: processing for this purpose is necessary for National Molding Italia S.r.l. to fulfil any legal obligations. The Personal Data provided will be processed according to applicable legislation, which may involve their retention and communication to the competent Authorities. The provision of Personal Data for this purpose is not mandatory, but without it, it will not be possible to execute the contract.

(iv) Recipients of Personal Data

The Personal Data of the Data Subject may be shared with the following subjects ("Recipients"):

- Subjects who may act as data processors, i.e., individuals, companies, or professional firms providing assistance and consultancy activities to the Data Controller in accounting, administrative, legal, tax, financial, credit recovery, IT, advertising material postal services, or contractual communications, market analysis, and research; a complete list of all processors can be requested by writing to the email address: privacy@nationalmolding.it;
- Subjects with whom it is necessary to interact for the provision of communication services, events, and seminars, including online;
- Subjects delegated to carry out technical maintenance activities (including maintenance of network devices and electronic communication networks);
- Subjects authorized by the Data Controller to process Personal Data necessary to carry out activities strictly related to the provision of services; these persons are under a legal obligation of confidentiality;
- Group companies for internal administrative purposes;
- Factoring companies, credit institutions, credit insurance companies;
- Subjects, entities, or Authorities to whom it is mandatory to communicate Personal Data to fulfil legal obligations, prevent abuse or fraud, or by order of the Authorities.

(v) Processing Methods

The processing of Personal Data is carried out through the following operations: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication,

deletion, and destruction of data. Personal data is processed both on paper and electronically and/or automatically, using storage space hosted in-house. The processing of data will be carried out in a way that ensures continuous security and confidentiality. In accordance with European regulations and national data protection laws, the Data Controller has implemented specific procedures to prevent unauthorized access, misuse or unlawful use, destruction, or accidental loss of data. Only personnel duly authorized by the Data Controller can access the data during the performance of their work.

(vi) Transfers of Personal Data

For purposes related to the execution of the contract, some data may be communicated to recipients located outside the EU Economic Area. The Data Controller ensures that the processing of personal data by these recipients is carried out in compliance with applicable legislation. Indeed, transfers are made through adequate safeguards, such as adequacy decisions, Standard Contractual Clauses approved by the European Commission. However, where, for the purposes indicated, the Company needs to transfer your personal data outside the European Union to countries not considered adequate by the European Commission, the Company will take the necessary measures to protect your personal data, in compliance with legal guarantees, pursuant to applicable legislation and in particular Articles 45 and 46 of the GDPR. More information is available at NATIONAL MOLDING ITALIA SRL by writing to the following address: privacy@nationalmolding.it. A complete list of Data Processors under Art. 28 Reg. EU 2016/679 can be requested by writing to the email address: privacy@nationalmolding.it. Aggregated and anonymous economic data transmissions are possible in relation to internal obligations within the corporate group.

(vii) Retention of Personal Data

Personal Data processed for the purpose of "Pre-contractual Obligations" will be retained for the time strictly necessary to pursue the aforementioned purposes, i.e., only for the duration of the negotiation. Data collected for Contractual Purposes will be retained for a period equal to the duration of the provision of services and for the 10 years following (the period in which the prescription for any contractual liability asserted by the customer against National Molding Italia S.r.l matures), except in cases where retention for a longer period is required for any disputes, requests from competent authorities, or pursuant to applicable legislation. Personal Data processed for the purposes of "Legitimate Interest of the Data Controller" will be retained for 2 years from the conclusion of the contractual relationship or for the longer time necessary to protect the Data Controller's interests from possible liabilities based on such processing. Personal Data processed for Marketing purposes will be retained for two years from the date on which the Data Subject's consent was given (without prejudice to the lawfulness of the processing carried out up to that point). Once consent is revoked, the Data Controller will cease all processing for such purposes but may retain what is necessary to protect its interests from possible liabilities based on such processing. Personal Data processed for the purpose of Sending commercial information will be retained by the Data Controller for two years from the conclusion of the contractual relationship or until the Data Subject objects to the processing by using the link available at the bottom of each email. Personal Data processed for the purpose of Compliance with legal obligations will be retained by the Data Controller for the period provided for by specific legal obligations or applicable regulations.

(viii) Data Subject's Rights

The Data Subject has the right, where the circumstances provided by law apply, to request from the Data Controller at any time:

- Access to their Personal Data, (and/or a copy of such Personal Data), as well as further information on the ongoing processing of them;
- Rectification or updating of their Personal Data;
- Deletion of their Personal Data from the databases;
- Restriction of the processing of their Personal Data;
- To exercise the right to data portability, i.e., to obtain in a structured, commonly used, and machine-readable format a copy of their Personal Data provided, or to request their transmission to another Data Controller;
- To object to the processing of their Personal Data.

The Data Controller will provide the Data Subject with information relating to one or more of the actions taken as listed above without undue delay and, in any case, no later than one month from the request itself. This period may be extended by two months, taking into account the complexity and number of requests, with consequent notification to the Data Subject of such extension and the reasons for the delay, to be provided within one month of receipt of the request. The Data Subject also has the right to lodge a complaint with the competent Supervisory Authority (for Italy, Garante Privacy, <http://www.garanteprivacy.it>), if they believe that the processing of their Personal Data is contrary to current legislation. The Data Subject may exercise the rights referred to in this article by sending an email to the following address:

privacy@nationalmolding.it.

9. Changes

This Privacy Notice is effective from March 22, 2024. The Data Controller reserves the right to modify or simply update its content, in part or completely, also due to changes in applicable legislation and for these reasons invites the Data Subject to regularly visit the website www.nationalmolding.it to take note of the most recent and updated version of the Notice in order to always be informed about the Personal Data collected and the processing carried out.

10 Definitions

- (i) "personal data": 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;
- (ii) "processing": any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction;
- (iii) "data controller": the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

- (iv) "data processor": a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller;
- (v) "recipient": a natural or legal person, public authority, agency, or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- (vi) "third party": a natural or legal person, public authority, agency, or body other than the Data Subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data;
- (vii) "consent of the Data Subject": any freely given, specific, informed, and unambiguous indication of the Data Subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them;
- (viii) "personal data breach": a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed;
- (ix) "binding corporate rules": personal data protection policies adhered to by a controller or processor established on the territory of a Member State for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity;
- (x) "supervisory authority": an independent public authority established by a Member State pursuant to Article 51;
- (xi) "concerned supervisory authority": a supervisory authority which is concerned by the processing of personal data because: a) the controller or processor is established on the territory of the Member State of that supervisory authority; b) Data Subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or c) a complaint has been lodged with that supervisory authority;
- (xii) "cross-border processing": a) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect Data Subjects in more than one Member State.

Trofarello, March 22, 2024