



ITaflon[®]
Fluoropolymers

VISITOR PRIVACY NOTICE – ACCESS MANAGEMENT AND CONTROL
Pursuant to Article 13 of Regulation (EU) 2016/679 (the “GDPR”)

In accordance with applicable personal data protection legislation, ITAFILON S.r.l. informs visitors and other external persons entering its premises about the processing of personal data for access management and control purposes.

1. Data Controller

ITAFILON S.r.l. Registered office:

Via Giacomo Puccini n. 5 – 24060 San Paolo d'Argon (BG) Tax Code and VAT No.: 03942330162 REA: BG – 442706

Certified email (PEC): itaflon@progettostudio.legalmail.it

Requests concerning personal data protection may also be sent to privacy@itaflon.com

2. Categories of Personal Data Processed

As part of the access registration procedure using the **Totem App. Reception** system, ordinary personal data relating to the visitor may be processed, such as:

first name and surname;

company/organisation to which the visitor belongs or with which they are associated;

date and time of entry, where recorded by the system;

any information strictly necessary for access management.

3. Purposes of Processing

Personal data are processed to:

a) manage and regulate access to company premises by visitors, suppliers, consultants, maintenance personnel and other external persons;

b) ascertain the presence of external persons on the premises, including for emergency management and evacuation procedures;

c) enable the management, allocation and return of access badges;

d) ensure the safety and security of people, premises and company areas and prevent unauthorised access;

e) enable access records to be reconstructed, where necessary, in connection with specific events affecting the safety of people or the security of company assets.

4. Legal Basis for Processing

Processing is based on the Data Controller's legitimate interest, pursuant to Article 6(1)(f) of the GDPR, in regulating and monitoring access to company premises, ensuring the safety of those present and protecting the premises and company assets.

Processing does not require the Data Subject's consent.

5. Provision of Personal Data and Consequences of Failure to Provide Them

The data needed to identify visitors and register their entry must be provided to allow visitors to enter company areas subject to access control. Failure to provide the necessary data may therefore mean that **access to company premises cannot be authorised**.

6. Processing Methods

Personal data are processed using IT and electronic communication tools, through the access management system and, where necessary, internal organisational procedures. Processing complies with the GDPR principles of lawfulness, fairness, transparency, data minimisation, purpose limitation and storage limitation, and is carried out using technical and organisational measures appropriate to the risk.

ITaflon S.r.l.

Via G. Puccini, 5 – 24060 San Paolo d'Argon (BG) ITALY - Vat Number 03942330162 R.E.A. BG - 442706 Social Capital
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7. Authorised Personnel and Data Recipients

Data may be processed by specifically authorised and instructed ITAFLOON S.r.l. personnel, within the scope of their respective duties and solely for the purposes set out in this notice. Data may also be processed by external parties providing services relating to the management, support, maintenance and hosting of the access control system, appointed, where applicable, as **Data Processors pursuant to Article 28 of the GDPR**. Data may be disclosed to public authorities, judicial authorities or other parties entitled to request them, where provided for by law or where necessary to protect the Data Controller's rights. Personal data **will not be disseminated to the public**.

8. Transfers of Data to Third Countries

In the ordinary course of processing, no transfers of personal data to countries outside the European Economic Area are envisaged. If the use of specific services or subcontractors involves transfers to third countries, such transfers may take place only in compliance with Articles 44 et seq. of the GDPR and the safeguards required by applicable legislation.

9. Data Retention Period

Personal data relating to visitor access are retained for a maximum of 90 days from the recorded time of departure. After this period, the data will be deleted or anonymised, unless further retention is necessary in connection with specific events, security requirements, requests from authorities, the establishment or defence of a legal claim, or legal obligations. In such cases, the relevant data will be retained only for the period strictly necessary to address the specific need.

10. Rights of the Data Subject

In the cases and within the limits provided for by applicable legislation, the Data Subject may exercise against the Data Controller the rights set out in Articles 15 et seq. of the GDPR and, in particular, may:

- obtain confirmation as to whether personal data concerning them are held and access those data;
- request the rectification of inaccurate data or the completion of incomplete data;
- request the erasure of data where the relevant conditions are met;
- request restriction of processing;
- object, on grounds relating to their particular situation, to processing based on legitimate interest, pursuant to Article 21 of the GDPR.

The Data Subject may exercise their rights by submitting a request to ITAFLOON S.r.l. using the contact details provided in section 1 of this notice. The Data Subject also has the right to lodge a complaint with the Italian Data Protection Authority if they consider that their personal data are being processed in breach of applicable legislation.

This notice was last updated in **August 2026**. ITAFLOON S.r.l. reserves the right to update or amend this notice if there are changes to the methods or purposes of personal data processing, the systems used or applicable legislation. Any material changes will be communicated to Data Subjects in a manner appropriate and proportionate to the nature of those changes.

Date of issue: 10/08/2026

ITAFLOON S.r.l.

The Data Controller

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