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PRIVACY NOTICE
CUSTOMERS AND CUSTOMER CONTACT PERSONS — COMMERCIAL RELATIONSHIPS AND SALES CONTRACTS
Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (the GDPR)

INTRODUCTION

ITAFILON S.r.l. regards the protection of personal data and the confidentiality of information as integral to the principles governing its relationships with customers, partners and business contacts.

In accordance with Regulation (EU) 2016/679 (the GDPR), Italian Legislative Decree No. 196/2003, as subsequently amended and supplemented, and applicable data protection legislation, the Company has adopted an organisational framework designed to ensure that personal data are processed in accordance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality. It implements technical and organisational measures appropriate to the nature of the processing carried out.

This privacy notice supplements the commercial and contractual documentation governing relationships with ITAFILON S.r.l. in respect of the processing of personal data.

As part of its policy for the protection and responsible management of personal data, ITAFILON S.r.l. pays particular attention to safeguarding information obtained in the course of commercial and contractual relationships and to using it solely for specified, legitimate and relevant purposes.

This notice, provided pursuant to Articles 13 and 14 of the GDPR, explains how ITAFILON S.r.l. collects, uses, retains and protects the personal data of individuals acting in various capacities within customer or prospective customer companies and organisations, including owners, legal representatives, business contact persons, employees, collaborators and persons acting on their behalf.

The notice covers processing carried out in the context of commercial relationships, pre-contractual activities and the performance of contracts, as well as related activities, for the purposes and on the legal bases set out below.

ITAFILON S.r.l. informs individuals acting as owners, legal representatives, contact persons, employees, collaborators or persons acting on behalf of customer or prospective customer companies and organisations about the processing of their personal data in the context of commercial, pre-contractual and contractual relationships.

1. DATA CONTROLLER

ITAFILON S.r.l.

Registered office: Via Giacomo Puccini No. 5 – 24060 San Paolo d'Argon (BG), Italy

Tax code and VAT number: 03942330162

REA registration number: BG – 442706

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

Email: privacy@itaflon.com itaflon@progettostudio.legalmail.it

2. CATEGORIES OF PERSONAL DATA PROCESSED

In the context of commercial and contractual relationships, ITAFILON S.r.l. may process ordinary personal data relating to representatives, contact persons and individuals acting on behalf of customer or prospective customer companies, including:

- identification and personal details;
- professional details, role, position and company affiliation;
- contact details, such as email addresses and telephone numbers;
- information relating to commercial enquiries, offers, quotations, orders and contractual relationships;
- administrative, accounting, tax and payment data, where these relate to individuals;
- information relating to communications exchanged with ITAFILON;

ITAFILON processes only data that are relevant and necessary for the purposes pursued.

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3. PURPOSES AND LEGAL BASES OF PROCESSING

Purpose	Description of processing	Legal basis
A. Handling commercial enquiries and pre-contractual activities	Handling requests for information, business contacts, preparation of offers and quotations, negotiations and other activities prior to establishing a commercial relationship.	Article 6(1)(b) GDPR — taking steps at the request of the data subject prior to entering into a contract, where directly applicable. In other cases, Article 6(1)(f) GDPR — ITAFLON's legitimate interest in managing commercial relationships with its counterparties.
B. Management and performance of commercial and contractual relationships	Order management, sale and supply of products, customer relations, operational communications, support, shipping, deliveries and activities connected with the performance of the commercial relationship.	Article 6(1)(b) GDPR — performance of a contract to which the data subject is a party. In other cases, Article 6(1)(f) GDPR — the Controller's legitimate interest in properly managing and performing contractual relationships with the organisation for which the data subject acts.
C. Administrative accounting and tax management	Invoicing, management of receipts and payments, bookkeeping and compliance with administrative, tax and accounting obligations under applicable legislation.	Article 6(1)(c) GDPR — compliance with legal obligations to which the Controller is subject; where relevant, Article 6(1)(b) GDPR — performance of the contractual relationship.
D. Credit management disputes and protection of rights	Management of unpaid amounts, debt collection, objections, complaints and disputes, and the establishment, exercise or defence of ITAFLON's rights, whether in or out of court.	Article 6(1)(f) GDPR — the Controller's legitimate interest in protecting its rights and interests.
E. Commercial and marketing communications	Sending promotional and commercial communications about ITAFLON's products, services, news, initiatives and events by email and other permitted means of communication.	Article 6(1)(a) GDPR — the data subject's consent, where required, read in conjunction with Article 130 of Italian Legislative Decree No. 196/2003. Consent is optional and may be withdrawn at any time.

Marketing communications: withholding consent to marketing does not affect the establishment, performance or continuation of a commercial relationship with ITAFLON S.r.l. Any consent given may be withdrawn at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Communications about similar products or services: where the conditions laid down in Article 130(4) of Italian Legislative Decree No. 196/2003 are met, an email address obtained in the context of a sale may be used to send communications about products or services similar to those previously purchased. The data subject may object at any time, easily and free of charge.

CONSENT TO COMMERCIAL AND MARKETING COMMUNICATIONS

Having read the Privacy Notice, Document 02.02 Rev. 01, the data subject, with regard to the use of their contact details by ITAFLON S.r.l. to send commercial and promotional communications about products, services, news, company initiatives and events by email and other electronic communication tools:

☐ GIVES CONSENT ☐ DOES NOT GIVE CONSENT

Consent is optional and may be withdrawn at any time without affecting the existing commercial relationship.

Full name of contact person: _____

Date: _____ Signature: _____

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4. PROVISION OF PERSONAL DATA

The provision of data required to handle enquiries, pre-contractual activities, the commercial relationship and statutory obligations is necessary to enable ITAFILON to establish and properly manage its relationship with the customer company.

Failure to provide the necessary data may prevent ITAFILON from responding to the enquiry or properly managing the commercial relationship.

The provision of data for marketing purposes is optional.

5. SOURCES OF PERSONAL DATA

Personal data may be collected directly from the data subject; from the company, entity or organisation for which the data subject acts; through ITAFILON's sales agents, intermediaries and commercial collaborators; or in the course of commercial relationships and related communications.

Where personal data are not obtained directly from the data subject, this notice is also provided pursuant to Article 14 of the GDPR.

6. METHODS OF PROCESSING

Personal data are processed using paper records, IT systems and electronic communication tools, in a manner closely related to the stated purposes and in accordance with the principles of lawfulness, fairness, transparency, data minimisation, accuracy, integrity and confidentiality.

ITAFILON implements technical and organisational measures appropriate to the risk and restricts access to data to authorised personnel according to their duties.

7. AUTHORISED PERSONNEL RECIPIENTS AND DATA PROCESSORS

Personal data may be processed by specifically authorised and instructed personnel of ITAFILON S.r.l. working, according to the relevant purposes, in sales, marketing, administration, accounting, logistics, technical departments and other functions involved in managing customer relationships.

Personal data may also be disclosed, to the extent necessary for their respective functions, to:

- sales agents and commercial collaborators;
- administrative, tax and legal advisers;
- banks and parties involved in payment processing;
- carriers, freight forwarders and logistics providers;
- companies providing IT, business management software, hosting, support and maintenance services;
- companies and advisers engaged to assist with the management, submission and reporting of applications relating to funding calls, incentives and grants;
- companies engaged in credit management and debt collection;
- insurance companies, where necessary;
- public, judicial or tax authorities, or other parties to whom disclosure is required by law.

Where the relevant conditions are met, parties processing personal data on behalf of ITAFILON will be appointed as processors pursuant to Article 28 of the GDPR. Other parties will process data in accordance with the data protection role applicable to the specific activity they perform. Personal data will not be made publicly available.

8. TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

In the context of international commercial relationships, some personal data may be disclosed to agents, collaborators or other parties operating in countries outside the European Economic Area.

Where processing involves a transfer of personal data to a third country, ITAFILON ensures that the transfer complies with Articles 44 et seq. of the GDPR, on the basis of an adequacy decision adopted by the European Commission or through other safeguards provided for by applicable legislation.

Data subjects may request information about the safeguards applicable to a specific transfer by contacting the Controller.

9. RETENTION PERIOD

Data relating to administrative, accounting and contractual management are retained for the duration of the relationship and thereafter for the period required by applicable legislation, generally for 10 years from the end of the relationship or the last relevant entry. Longer periods may apply where necessary in connection with disputes, investigations, legal obligations or the protection of the Controller's rights.

Data processed for the management of complaints, unpaid amounts or disputes may be retained for as long as necessary to resolve the matter and for any further periods necessary to protect legal rights.

Data used for marketing purposes will be processed until consent is withdrawn or the right to object is exercised. Such data will in any event be reviewed periodically to determine whether they remain necessary and relevant to the purpose pursued.

10. AUTOMATED DECISION MAKING

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Personal data are not used to make decisions based solely on automated processing that produce legal effects concerning the data subject or similarly significantly affect them within the meaning of Article 22 of the GDPR.

11. RIGHTS OF THE DATA SUBJECT

In the circumstances and subject to the limitations provided for by the GDPR, data subjects may:

- obtain confirmation as to whether personal data concerning them are being processed and access those data;
- obtain the rectification of inaccurate data and the completion of incomplete data;
- request the erasure of data where the relevant conditions are met;
- request restriction of processing;
- exercise the right to data portability in the circumstances provided for by Article 20 of the GDPR;
- object, on grounds relating to their particular situation, to processing based on the Controller's legitimate interests;
- withdraw any consent given at any time.

For marketing purposes, data subjects may withdraw consent and request that promotional communications cease at any time. Rights may be exercised by sending a request to ITAFLON S.r.l. using the contact details in Section 1.

Data subjects also have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) if they consider that the processing of their personal data infringes applicable legislation.

12. UPDATES TO THIS PRIVACY NOTICE

This privacy notice was updated in August 2026 – Rev. 01.

ITAFLON S.r.l. reserves the right to update or amend this notice if there are changes to the methods or purposes of processing personal data, the systems used or applicable legislation.

Data subjects will be informed of any material changes by means that are appropriate and proportionate to the nature of those changes.

Date of issue: 10 August 2026

ITAFLON S.r.l.

The Data Controller

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