



ZAGO S.p.A.  
A FERRETTIGROUP COMPANY

## Policy on the processing of personal data in accordance with Regulation (EU) 679/2016 -Customers-

### DATA CONTROLLER

The Data Controller is Zago S.p.A., headquartered at Scorze' (Venice), Via Padova 32 (hereinafter "ZAGO" or the "Controller").

For the exercise of the rights under Regulation (EU) 2016/679 ("GDPR" or "Regulation") or for any clarification about the processing of your personal data, please contact the Controller at: email [info@zagospa.it](mailto:info@zagospa.it) - tel. +39 041 8892210

The Controller has appointed a Data Protection Officer, who can be contacted at: [DPO@zagospa.it](mailto:DPO@zagospa.it)

Under the GDPR:

- the Data Controller is the natural or legal person, who, alone or jointly with others, determines the purposes and means of the processing of personal data;
- personal data is any information regarding an identified or identifiable natural person ("Data Subject");
- the Controller is responsible for informing the Data Subjects about the processing of their personal data.

ZAGO is providing this Policy in order to give the information required by Article 13 GDPR, to all Data Subjects who may be involved in the processing activities described below.

### How does Zago S.p.A. collect and process your data?

The Controller processes various types of personal data, including, by way of example:

- o first name, last name,
- o tax code;
- o email;
- o address;
- o telephone number;
- o details of financial status;
- o details necessary for management of orders.

The personal data is processed:

#### 1) for the management of the contractual relationship and related activities

Your personal data are processed in order to initiate the preliminary activities resulting from the management of the contractual relationship, for payments management, the processing of complaints, as well as to fulfil any other obligation arising from these activities, including the recording and archiving of your personal data.

Your personal data are also processed in order to prevent fraud, including contractual fraud. Finally, your data (including your landline and/or mobile telephone number and email address) will be processed to provide assistance with the contractual services. Your data will also be processed for all the connected or instrumental activities which have a functional link to the operations of the Controller or to the protection of its rights, including: insurance purposes; management of orders, internal quality assurance; the fulfilment of legal obligations, accounting, fiscal or administrative





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obligations; the management of potential disputes with customers, either through the courts or on an extrajudicial basis.

Your personal data may also be used to send specific communications and information regarding contractual deadlines or obligations, the method used to provide the service, or other operational requirements. Without prejudice to the principles of necessity, relevance and proportionality, these communications may be made by post, telephone (landline or mobile number by direct call, pre-recorded call and/or SMS) or by email.

Your information is also collected from third parties, including, by way of example:

- lists and registers held by public authorities or under their authority, or similar entities based on specific national and/or international regulations.

## 2) for IT security purposes

The Data Controller processes your personal information, including through its suppliers (third parties and/or recipients), to the extent strictly necessary and proportionate to guarantee the security and capacity of a network or of the connected servers to withstand, at a given level of security, unforeseen events or unlawful or fraudulent acts that compromise the availability, authenticity, integrity and confidentiality of the stored or transmitted personal data.

To this end, the Data Controller has procedures in place for the management of data breaches.

### What happens if you don't provide your data?

If you don't provide your personal data, the Data Controller will not be able to complete the processing operations relating to management of the contract or related services, nor can it fulfil any related obligations.

The Data Controller intends to perform certain processing based on specific legitimate interests which do not affect your right to privacy, such as processing which:

- enables the prevention of IT incidents and the notification of data breaches to the regulatory authority or the disclosure of data breaches to consumers;
- enables communication to third parties/recipients for activities related to management of the contract.

### Categories of recipients of personal data

Personal data may only be accessed by authorised persons who have been appointed as Processors, to process data on the Controller's behalf. Authorised persons are bound by secrecy and confidentiality, also on the basis of specific internal regulations.

The data collected for the above purposes may be communicated to public bodies, banks, insurance companies (for the management of any insured risks), finance authorities, law firms, arbitrators, debt recovery firms (for legal or extrajudicial protection), carriers or hauliers or, where necessary to fulfil the contract, to companies in the Ferretti Group and to other companies and/or businesses (including partners of the Controller), advisers, technical providers, etc.





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Such disclosures of personal data are necessary as they are made on the basis of a legal or contractual obligation or they are a necessary prerequisite for the formation of the contract or, for the pursuit of a legitimate interest.

## How and for how long will your data be stored?

### How

Data processing is performed on paper or by means of IT procedures by appropriately authorised and trained in-house personnel. They are granted access to your personal data to the extent and within the limits necessary for the performance of data processing activities.

The Data Controller regularly checks the tools used to process your data and the related security measures; it will, through authorised data processors, check that personal data has not been collected, processed, stored or kept if it is not necessary for the processing; it checks that the data is kept with the guarantee of integrity, authenticity and use for the intended purpose.

### Where

The information is stored in paper, computerised and electronic archives located within the European Economic Area. Your personal data will not be transferred to countries outside the European Union.

### How long

Your personal data will be processed for the time strictly necessary to pursue the above purposes, or for any other related, legitimate purpose. If your personal data is processed for different purposes, it will be kept until the expiry of the longest period; however it will not be processed for the purposes for which the conservation period has ended.

Any personal data which is no longer required or for which there is no legal foundation for its conservation, will be irreversibly anonymized (or definitively erased).

Personal data supplied for the primary purposes will be kept for the period identified according to the criteria of necessity, based on the various purposes pursued and in any event, in accordance with the current laws on data protection, conservation of accounting records and business documentation (in accordance with Article 2220 civil code) and based on the logic of protecting the Controllers' rights (for example: the limitation periods contained in the civil code).

Where certain processing operations are disputed and/or certain data is necessary in order to exercise a legal right, the conservation period may exceed the above limits and may continue until the dispute is settled.

## Rights of the Data Subject

The data subject is entitled to obtain the following:

- access to the personal data and information (Article 15 GDPR);
- the rectification or erasure of the data (Articles 16 and 17 GDPR);
- limitation of processing (Article 18 GDPR).

Finally, the data subject may:

- object to the processing of personal data under the conditions and limits indicated in Article 21 GDPR.
- exercise the right to portability of data (Article 20 GDPR).





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With regard to processing operations based on consent – under Article 6 paragraph 1 a and article 9 paragraph 2 a GDPR – please note that the data subject may revoke consent at any time (without affecting the legality of the processing based on consent even prior to revocation).

Finally, if the data subject considers that the processing of their personal data infringes the Regulation, they may submit a complaint to a regulatory authority (the Data Protection Authority or any other competent authority) under Article 77 et seq. GDPR.

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