



GDPR & PRIVACY POLICY

**PRIVACY POLICY AND PROTECTION OF
PERSONAL DATA COLLECTED ON WEBSITE
WWW.REPI.COM**



FERLINE SA based in 6900 Lugano, Via P. Lucchini 2, Switzerland, as Holding of REPI Group and as data controller for the processing of personal data pursuant to EU Regulation 679/2016 effective as of 25th May 2018 - General Regulation on Data Protection (“GRDP”) (hereinafter referred to as “Applicable Regulations”) recognizes the importance of the protection of personal data and considers their protection as one of the main objectives of its business. In compliance with the Applicable Regulations we hereby submit the necessary information regarding the processing of personal data provided. FERLINE SA invites you to read this information carefully because it contains important information on the protection of personal data and the security measures taken to ensure confidentiality in full compliance with the Applicable Regulations. FERLINE SA confirms that the processing of personal data will be based on the principles of legality, fairness, transparency, purpose limitation and retention, data minimization, accuracy, integrity and confidentiality. Therefore, personal data will be processed in accordance with the legislative provisions of the Applicable Regulations and the confidentiality obligations set out therein.

DATA CONTROLLER

In accordance with the Applicable Regulations, the data controller is FERLINE SA based in 6900 Lugano, Via P. Lucchini 2, Switzerland. For any information concerning the processing of personal data by the Data Controller, including a request for the list of data processor personnel working on behalf of the Data Controller, please contact ferline@repi.com.

PERSONAL DATA UNDERGOING PROCESSING

“Personal Data” refers to any information concerning an identified or identifiable physical person with particular reference to an identifier such as a name, an identification number, location data, an online identifier or one or more elements pertaining their physical, physiological, psychic, economic, cultural or social identity.

“Particular Data” refers to personal data sufficient to reveal the racial and ethnic origin, religious or philosophical convictions, or membership of Trade Unions, as well as genetic and biometric data, data related to health or sex life or to sexual orientation of the person.

“Judicial Data” refers to personal data relating to criminal convictions and crimes or related security measures.

“Processing” refers to any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or set of personal data, such as collection, registration, organization, structuring, preservation, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of making available, comparison or interconnection, limitation, cancellation or destruction.

DATA PROCESSING LOCATION



Data processing takes place at the aforementioned headquarter of the data controller, at the operational offices and at identified third parties.

TYPES OF DATA PROCESSED

The processing relates to personal and identification data provided voluntarily by the party concerned (for example but not limited to: name, surname, address, VAT number, tax code, phone or mobile number, e-mail address, bank account details, etc.).

PURPOSE, LEGAL ASPECT AND OBLIGATORY OR OPTIONAL NATURE OF THE PROCESSING

Personal data voluntarily provided will be processed by the data controller for the following purposes:

- Information and promotions. The use of e-mail coordinates provided by the customer collected through the institutional website www.repi.com is permitted for the purpose of sending information and newsletters. The party concerned, at the time of collection and at the time of sending each communication, is informed of the possibility to object at any time to the processing, easily and free of charge.

Please note that if you are already our Partner, we may send you commercial communications relating to services and products of REPI similar to those already used, unless your disapproval has been expressly stated.

METHOD OF PROCESSING - DATA CONSERVATION

The processing will be carried out in both an automated and manual manner, with methods and tools aimed at safeguarding maximum security and confidentiality, by persons appointed as responsible for and in charge of processing in accordance with the applicable legislation. The data will be stored for a period not exceeding the purposes for which such data were collected and subsequently processed.

EXTENT OF COMMUNICATION AND DIVULGATION

The data object of the processing will not be divulged, unless explicit authorization of the interested party has been granted after appropriate information. The data may instead be communicated to companies contractually linked to the Data Controller and, where necessary, also to persons inside and outside the European Union, in accordance with the current legislation. The data may be disclosed to third parties belonging to the following categories:



- subjects that provide services for the management of the information system used by the Data Controller and the telecommunications networks, and that are responsible for the maintenance of the technological areas (including e-mail and the newsletter service);
- individuals and entities that collaborate with the Data Controller;
- professionals, firms or companies in the field of assistance and consultancy;
- competent authorities for the fulfilment of legal obligations and/or provisions of public entities, upon their request.

The identification data processed in compliance with corporate security procedures are not subject to communication, without prejudice to express and specific requests on the part of the competent judicial and investigative Authorities. The individuals belonging to the aforesaid categories perform the function of Data Processing Manager or operate in complete autonomy as separate Data Controllers. The list of data processor personnel and shared data controllers is constantly updated and available on request from the Data Controller's headquarters. Any further communication or divulgation will take place only with the explicit consent of the party concerned. Moreover, during the ordinary processing activities, they will be able to access personal and identifying data and therefore become aware of the subjects expressly designated by the writer as responsible and/or in charge of processing, authorized according to their respective profiles.

NATURE OF CONFERRAL AND REFUSAL

With regard to the data that we are obliged to obtain in order to fulfil the obligations arising from existing contracts, and the obligations demanded by laws, regulations, Community legislation, or provisions issued by the Authorities legitimated to do so by law and by supervising and controlling entities, failure to provide such data will make it impossible to establish or continue the relationship, within the limits in which such data are necessary for the execution of the same. The provision of data to allow the Data Controller to send commercial communications is optional; the party concerned can object to the treatment at any time by exercising the rights provided for under the Applicable Regulations in the forms and methods indicated herein.

The Data Controller also states that any non-communication, or incorrect communication, of one of the mandatory information areas will have the following consequences:

- the impossibility for the Data Controller to guarantee the adequacy of the processing itself to the contractual agreements for which it is performed;
- the possible lack of correspondence of the results of the processing to the obligations imposed by the fiscal, administrative and civil law to which it is addressed.

RIGHT OF ACCESS TO PERSONAL DATA AND OTHER RIGHTS

Finally, we inform you that at any time you can exercise your rights relative to the Data Controller under the Applicable Regulations, then obtain confirmation of the



existence or otherwise of these data, know their content and origin, verify their accuracy, ask for integration, updating, or correction. Upon the occurrence of the conditions set forth in the Applicable Regulations, you have the right to request the cancellation, limitation of processing, portability, and to object, for legitimate reasons, to their processing.

RULES OF EXERCISE OF RIGHTS

You may exercise your rights at any time by sending an e-mail to ferline@repi.com.

Lugano, 1st November 2020