



CUSTOMER PRIVACY POLICY **ex Article 13 EU Regulation No. 2016/679**

The following privacy policy is provided pursuant to Article 13 of the European Regulation No. 2016/679 and is intended to provide the following information necessary to ensure a correct and transparent processing of your personal data.

The Controller

The Controller is Sterling S.p.A., C.F. and VAT number 03049420544, with its registered office at Via della Carboneria, n. 30 – 06073 – Corciano (PG) – Italy (hereinafter, the “**Company**”) – e-mail: privacy@sterling.it.

Processing purpose and legal basis

The processing of personal data provided by customers is aimed solely at:

Processing purpose	Legal Basis
Performance of obligations related to the pre-contractual and contractual phase	Performance of the contract
Compliance with obligations required by Italian and European law, regulations, civil and fiscal rules	Legal obligations
Operations management of the contract	Performance of the contract
Logistics related activities	Performance of the contract
Protection of contractual rights	Performance of the contract
Obligations related to the Management System	Legitimate interest of the Controller

Recipients or other possible categories of recipients of personal data

Your personal data may be communicated, only for the achievement of the above-mentioned purposes, to the following categories of recipients:

- Postal service companies, carriers, logistic operators.
- Information Technology, administrative and fiscal consulting companies.
- Debt collection and insurance companies.
- Financial auditors.
- Banking institutions for the management of collections and payments.
- Financial administrations and other public authorities in compliance with law requirements.
- Consulting companies and law firms for the protection of contractual rights.
- Group companies (only for administrative and accounting purposes).

Data retention period

The data provided in compliance with the above-mentioned purposes will be kept for:

Processing purpose	Retention Criteria
Performance of obligations related to the pre-contractual and contractual phase	10 years after the date of the last registration under Article 2220 of the Italian Civil Code - Cancellation policy related to accounting administration
Compliance with obligations required by Italian and European civil and fiscal laws	
Operations management of the contract	
Logistics related activities	
Protection of contractual rights	
Obligations related to Management System	3 years

How and where we process your personal data

Your personal data will be processed within the European Union through IT/manuals tools for which we have applied appropriate security measures and with the support of our staff who has been duly authorized and trained for this specific purpose. However, it is understood that the Controller, if necessary, shall have the right to move servers even outside the European Union. In such a case, the Controller hereby ensures that the transfer of personal data outside the European Union shall take place in compliance with the applicable legal provisions, for example through the adoption of standard

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C.F. / P.IVA IT03049420544 – Numero R.E.A. PG260072
Capitale Sociale: € 3.000.000,00 i.v.

Soggetta ad attività di direzione e coordinamento
di S.N.I.F.F. ITALIA S.p.a.



contractual clauses provided by the European Commission that ensure an adequate level of protection of personal data even outside the European Union.

Rights of the data subject

As a data subject, you have the right to: (i) request access to your personal data; (ii) ask for the rectification, limitation of deletion of your personal data; (iii) oppose to the processing of your personal data and (iv) request the portability of your personal data, if necessary. To facilitate the exercise of your rights, the Company has created a special e-mail address privacy@sterling.it or, alternatively, you can use any other mean of contact of our Company (telephone, fax, etc.) Before we can provide or modify any information, you might be asked to verify your identity and answer some questions. An answer will be provided as soon as possible.

Right to complain

If you still consider that your rights have been violated, you can lodge a complaint before the Privacy Authority through the appropriate form published on the website www.garanteprivacy.it

Mandatory disclosure of personal data and consequences of refusal

Processing purpose	Mandatory	Consequences of refusal
Performance of obligations related to the pre-contractual and contractual phase	YES	Impossibility to establish the contractual relationship
Compliance with obligations required by Italian and European civil and fiscal laws	YES	
Operations management of the contract	YES	
Logistics related activities	YES	
Protection of contractual rights	YES	
Obligations related to Management System	YES	