



Cogne Acciai Speciali

COGNE ACCIAI SPECIALI S.p.a.

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PRIVACY NOTICE FOR CLIENTS

When carrying on its business, Cogne Acciai Speciali S.p.A. (hereinafter the “**Company**”) pays particular attention to the security and confidentiality of its clients’ personal data. The Company is the ‘Controller’ of the personal data collected by Cogne Acciai Speciali S.p.A.

Which personal data may be collected

The following categories of personal data relating to you may be collected:

- ✓ **Contact data** – information on your name, address, telephone number, mobile telephone number, email address, professional role;
- ✓ **Interests** – information you have provided regarding areas that interest you, for example products you find interesting;
- ✓ **Website data** – information on how you use the web site www.cogne.com, including information collected via cookies (you can find our cookie notice here: <http://www.cogne.com/policy-cookie>).

How we collect your personal data

The Company collects and processes your personal data when you and us take contact (e.g. via email, phone calls, business cards exchange, etc.) aiming at exchanges of commercial information and establishment of contractual relationships. Also, the Company collects and processes your personal data if you navigate its website (www.cogne.com) to take a view of its products, locations, history, quality certifications and to contact it.

If you provide personal data on behalf of someone else, you must first ensure they have read this Privacy Policy. Kindly help us to keep your personal data up-to-date by informing us of any changes. Any change in address should be promptly communicated to the Company in order to avoid problems with our services.

For what purposes can your personal data be used

a) Establishment and execution of contractual obligation and resulting obligations, including communications regarding products and services (for example to perform after-sales services).

The Company may process your Contact data and interests in order to establish and execute a contractual relationship, to provide services requested or to respond to reports or complaints. The Company may also use your contact details, particularly your email address, to provide you with information concerning products and services. Legal bases for the processing: performance of a contract. The provision of data is obligatory to enable us to manage the contractual relationship; in the absence of the data, we will be unable to put the contract into effect.

b) Operational management and strictly connected purposes for accessing and using the website.

Your contact details and the data concerning your use of the website are processed to guarantee the operational management (and strictly related purposes) of access and use of the website, in order to allow you to take a view of our company’s products, locations, history and quality certifications, as well as contacting it. Legal bases for the processing: fulfillment of contractual obligations. The provision of data is obligatory to respond to your requests; in the absence of the data we will not be able to manage your request.

c) Compliance with legally-binding requests by the legal authorities to discharge obligations of law, regulations or provisions

The Company collects your personal data to comply with legal obligations. Legal basis for the processing: legal obligations, to which the Company must comply.

How we keep your personal data safe

The Company has established a wide range of security measures to improve protection and keep the security, integrity and accessibility of your personal data. All your personal data are stored on our secure servers (or on secure paper copies)



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or on those of our suppliers or commercial partners, and may be accessed and used based on our standards and our security policies (or equivalent standards for our suppliers or commercial partners). The security measures we have adopted include severe restrictions on access to your personal data, based on necessity and solely for the purposes communicated and perimeter security systems to prevent unauthorised external access. If you have a password that allows you to access our website, you will be responsible for its security and for compliance with any other security procedure that we give you notice of. We ask you not to share your password with anyone.

How long do we store your information for

We will keep your personal data only for the lapse of time necessary to achieve the purposes for which they were collected or for any other related and lawful purpose. Therefore, if your personal data are processed for two different purposes, we will keep the data until the lengthier purpose is achieved. However, we will cease to process the personal data collected for the purpose whose retention period has expired. We limit access to your personal data to only those individuals who need to use them for the appropriate purposes. When your personal data are no longer required, or when there is no longer any legal precondition for keeping them, they will be irreversibly anonymized (and in such a way may be stored) or securely destroyed. The retention periods relating to the different purposes described above are indicated to follow:

a) Compliance with contractual obligations: data processed to comply with any contractual obligation may be kept for the duration of the contract and in any case no longer than the subsequent 10 years, in order to verify any outstanding issues including accounting documents (e.g. invoices).

b) Operational management and strictly connected purposes for accessing and using the website: processed data may be kept for the duration of the contract and in any case no longer than the subsequent 10 years

c) In the event of disputes: should it be necessary for us to defend ourselves or take action or bring claims against you or third parties, we may keep the personal data we deem reasonably necessary for such purposes, for the length of time it takes to pursue the claim.

Who we can share your personal data with

Your personal data may be accessed by duly-authorized employees and by external suppliers, appointed, if necessary, as data processors, who support us in providing services. Please contact us at privacy@cogne.com if you would like to see a list of the data processors or other entities to which we communicate data.

Contacts

The contact details for the Company, in its capacity as Data Controller, and the Data Protection Officer (DPO) may be found at <http://www.cogne.com/privacy>. Should you have any questions regarding our processing of your personal data, kindly email us at privacy@cogne.com or contact us by phone on +39 0165 3021 asking for the Human Resources Department.

Your personal data protection rights and your right to file complaints before the supervisory authorities

On certain conditions, you are entitled to request:

- ✓ access to your personal data,
- ✓ a copy of the personal data you have provided to us ('portability'),
- ✓ the adjustment of data in our possession,
- ✓ the deletion of any data for which the legal precondition for processing no longer exists,
- ✓ to deny processing for direct marketing purposes,
- ✓ to revoke your consent, in cases where the processing is based on consent,
- ✓ to limit the way in which we process your personal data.

The exercising of the above rights is subject to certain exceptions that are intended to safeguard the public interest (e.g. the prevention or identification of crimes) and our interests (e.g. maintaining professional secrecy). Should you wish to exercise any of the above rights, we will check that you are entitled to do so and will usually respond within one month.

We endeavour to respond to any complaints or reports concerning the methods used to process your data. Nevertheless, should you wish, you may forward your complaints or reports to the authority responsible for data protection using the following contact details: Garante per la protezione dei dati personali - Piazza di Monte Citorio no. 121 - 00186 ROMA - Fax: (+39) 06.69677.3785 - Telephone: (+39) 06.696771 - Email: garante@gpdp.it - Certified email address: protocollo@pec.gpdp.it.