

PRIVACY NOTICE PURSUANT TO ART. 13 OF GDPR 2016/679 (European Regulation on the Protection of Personal Data) CONTACT FORM AND NEWSLETTER PRIVACY NOTICE

This notice is provided to users who complete the contact form on the website www.comergroup.it and/or who give their consent to subscribe to the newsletter of Comer S.r.l., pursuant to article 13 of the GDPR.

1) IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER The Data Controller is Comer S.r.l. – Via Oroboni, 26/28 – 27029 Vigevano (PV) – VAT No. | Tax Code 00174100180 – Tel. 0381 42661 – privacy@comergroup.it.

2) PERSONAL DATA PROCESSED The following data are collected through the contact form: first and last name, e-mail address, message content. Such data are provided voluntarily by the user.

3) PURPOSES AND LEGAL BASIS FOR PROCESSING We process personal data in accordance with the provisions of EU General Regulation No. 2016/679 on data protection for the following purposes:

a) Management of contact requests (Art. 6(1)(b) and (f) GDPR): Responding to enquiries, quotation requests and communications submitted via the contact form, within the framework of pre-contractual measures taken at the request of the data subject, or on the basis of the legitimate interest of the Data Controller in responding to received communications. Consent is not required for this purpose.

b) Sending of newsletters and commercial communications (Art. 6(1)(a) GDPR): Subject to the data subject's express and optional consent, Comer S.r.l. may send to the provided e-mail address informational and promotional communications relating to its products, services, technological updates, trade fair participation and events. Consent may be withdrawn at any time, without affecting the lawfulness of processing carried out prior to withdrawal.

4) WITHDRAWAL OF CONSENT AND RIGHT TO LODGE A COMPLAINT You are entitled to grant or withhold consent by ticking the appropriate box in the dedicated consent section. The consent for marketing purposes (newsletter) is separate and optional from the mandatory consent required to send the contact message. Any consent given may be withdrawn at any time (Art. 7 GDPR) by writing to privacy@comergroup.it. Withdrawal is valid for the future and does not affect processing carried out prior to it. You may request a list of consents given at any time.

5) RECIPIENTS OF PERSONAL DATA Data are not subject to dissemination. They may be disclosed, to the strictly necessary extent, to: authorised internal staff; e-mail service providers and newsletter sending platforms (acting as data processors pursuant to Art. 28 GDPR); IT systems maintenance companies; web agencies.

6) PROCESSING METHODS Data are processed using electronic and IT tools, in compliance with the principles of lawfulness, fairness and transparency. The Data Controller has implemented appropriate security measures to protect data from unauthorised access, loss or destruction.

7) DATA TRANSFERS The management and storage of personal data processed directly by the Data Controller will take place on servers located within the European Union. For social media platforms, please refer to their respective privacy policies. The Data Controller ensures that, in the event of transfers of data outside the EU, all transfers will be carried out in compliance with applicable legal provisions, entering into agreements guaranteeing an adequate level of protection and/or adopting the standard contractual clauses provided for by the European Commission, where necessary.

8) DATA RETENTION Data relating to the management of contact requests are retained for the time necessary to fulfil the request and, in any case, for no longer than 24 months from receipt, unless a contractual relationship is established. Data processed for newsletter purposes are retained until the withdrawal of the data subject's consent.

9) DATA SUBJECT RIGHTS The data subject has the right to exercise, at any time, the rights set out in Arts. 15–22 GDPR: right of access (Art. 15), rectification (Art. 16), erasure (Art. 17), restriction of processing (Art. 18), data portability (Art. 20), and objection (Art. 21). To exercise these rights or to request removal from the newsletter list (i.e. "unsubscribe"), the data subject may write to privacy@comergroup.it.

10) RIGHT TO LODGE A COMPLAINT The data subject has the right to lodge a complaint with the Italian Data Protection Authority or with the supervisory authority of the Member State of their habitual residence or place of work.





11) OBLIGATION TO PROVIDE DATA The provision of data (name, e-mail address, message) is mandatory in order to submit the contact form. Consent for marketing purposes (newsletter) is optional: refusal will have no consequence on the submission of the contact request.

12) AUTOMATED DECISION-MAKING The Data Controller does not make decisions based solely on automated processing, including profiling, that produces legal effects concerning the data subject or similarly significantly affects them (Art. 22 GDPR).

