

Vers. Mod.: IC-ENG – Update. 05/2026

Customer

Subject: Information on the processing of personal data.

*Articles 13 and 14 of European Regulation No. 679/2016
Legislative Decree 196/2003 amended by Legislative Decree 101/2018
Article 13 Law . n. 132 of 23 September 2025*

Dear Customer,

The undersigned company, Metalli Estrusi SpA., with registered office at Via Sangervasio, 126 – 25062 Concesio (BS), Tax Code and VAT No.: 00516370178, as the "Data Controller," hereby informs you, pursuant to Articles 13 and 14 of European Regulation No. 679/2016 (hereinafter "EU Regulation"), that your data will be processed as indicated below.

1. Purpose of Processing

The Data Controller hereby informs you that personal data, identifying information (e.g., name, surname, company name, address, telephone number, email address, bank and/or payment details, etc.), hereinafter referred to as "personal data" or simply "data," relating to you, whether collected verbally, directly or through third parties, may be processed in full compliance with the EU Regulation.

Data processing means any operation or set of operations concerning the collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, dissemination, or destruction of data.

2. Nature of the Data Processed, Legal Basis, and Purpose of Processing

Nature of the Data Processed. In relation to the contractual relationship or in relation to all stages preliminary to the conclusion of the contract, only "common personal data" will be processed, such as, for example:

- personal data (name, surname, etc.), residential address and/or domicile, and contact details (telephone, mobile, email, and/or other);
- bank and/or payment details;
- Clarification: only exceptionally and only to fulfill the pre-contractual, contractual and fiscal obligations deriving from existing relationships with you and/or to fulfill the obligations established by the Law, by a regulation, by community legislation, special data may be processed (art. 9 EU Regulation) subject to adequate information and collection of consent.

Purpose of processing. Your personal data will be processed for the following purposes:

- A. Execution of a contract to which the data subject is a party or the implementation of pre-contractual, contractual, and tax measures adopted at the data subject's request;
- B. To fulfill obligations under the law, regulations, EU legislation, or an order from an authority (such as, for example, anti-money laundering) to which the Data Controller is subject;
- C. To comply with civil, accounting, tax, and public safety regulations, as well as the administrative management of the relationship (invoicing, possible document management, etc.) and any obligations related to the execution of the contract with appointed Professionals;
- D. To send communications relating to events, demonstrations, etc. in which the data subject is registered and/or may participate;
- E. For statistical analysis, market research, and quality control;
- F. For insurance management;

G. Information analysis, optimization of e-Business Intelligence processes using Artificial Intelligence systems: Your personal data (e.g., document history, orders, geographic location, etc.) may be processed pseudonymously within advanced analysis systems and artificial intelligence algorithms for the purpose of streamlining internal procedures.

Precautions: The "key" to re-associate the code with your identity is stored separately and protected by technical and organizational security measures. The analysis does not involve fully automated decision-making processes that produce direct legal effects without human supervision (so-called "Human in the loop").

Legal basis for processing. Your personal data, for the purposes referred to in points 2A to 2F, will be processed, respectively, for the pursuit of a legitimate interest of the Data Controller (Article 6, paragraph 1, letter f, Recitals 47, 48, and 113 of the EU Regulation), for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures adopted at the data subject's request (Article 6, paragraph 1, letter b, EU Regulation), or to fulfill a legal obligation to which the Data Controller is subject (Article 6, paragraph 1, letter c, EU Regulation).

With regard to point G the legal basis is represented by the legitimate interest of the Data Controller (Article 6, paragraph 1, letter f of the EU Regulation).

3. Processing methods

Existence of an automated decision-making process, including profiling

The processing of your personal data is carried out using the operations indicated in Article 4(2) of the EU Regulation, specifically: collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, and blocking. Data processing will be based on the principles of fairness, lawfulness, and transparency and may be carried out manually, electronically, and/or electronically, on paper and/or digital media. Processing will be carried out in a manner that guarantees the security and confidentiality of the data.

Your personal data will be processed using paper and electronic means, both by Company personnel authorized to process personal data, and by external parties appointed to perform specific tasks on behalf of the Data Controller, acting as Data Processors pursuant to Article 28 of the EU Regulation. These parties will be subject to our letter of appointment, which imposes on them the duty of confidentiality and security of the processing of personal data and the adoption of appropriate security measures to prevent data loss, unlawful or improper use, and unauthorized access, in compliance with applicable data protection regulations.

For the sake of brevity, a detailed list of these individuals is available at the Data Controller's headquarters and is at your disposal.

Your personal data will not be disseminated or transferred to third countries or international organizations, nor will it be disclosed to third parties except as required by law or contractual obligations (please note that the communication of data to other Group companies also falls within contractual obligations, as their activities are essential to the completion/performance of your request).

Pursuant to Article 13 of Law No. 132 of 2025, the Data Controller informs you that:

- that during the performance of the contract to which the data subject is a party, where deemed appropriate, it may use Artificial Intelligence systems to perform activities that are instrumental and/or support professional activity, as indicated in point 2.k of this privacy policy;
- that the use of Artificial Intelligence systems will always be in full compliance with the provisions of the EU Regulation to guarantee the protection of the data subject's privacy and confidentiality;
- that artificial Intelligence will be used exclusively to support internal activities, such as, but not limited to, the management of organizational and secretarial activities, specific research, preliminary analysis of documents, and the preparation of drafts or summaries;

- that the result derived from the Artificial Intelligence systems will be subject to careful and accurate verification by the appointed and authorised personnel.

4. Data retention periods and other information

The processing will be carried out automatically and/or manually, in compliance with the provisions of Article 32 of the EU Regulation on security measures, by specifically appointed persons and in compliance with the provisions of Article 29 of the EU Regulation as well as with the provisions of Article 2 quaterdecies of Legislative Decree 196/2003 (amended by Legislative Decree 101/2018).

We inform you that, in compliance with the principles of lawfulness, purpose limitation, and data minimization, pursuant to Article 32 of the EU Regulation, the processing of your personal data will be carried out by authorized personnel. 5 of the EU Regulation, subject to your free and explicit consent, your personal data will be retained for the period of time necessary to achieve the purposes for which they are collected and processed and/or for the time required by legal obligations, or until the data subject withdraws their specific consent. Therefore:

- with reference to the purposes indicated in points 2A to 2F, the data will be retained for no longer than is strictly necessary to fulfill legal and contractual obligations;

Specific retention periods for each data category are available at the company upon request.

The processing is carried out exclusively by the data controller or by persons appointed pursuant to Articles 28 and 29 of the EU Regulation, who operate using IT and electronic means with logic strictly related to the stated purposes and, in any case, in a manner that guarantees the security and confidentiality of the data.

It should be noted that in the absence of significant contact for a period of ten years, or in the event the data subject exercises the rights provided by the EU Regulation (e.g., the right to erasure/right to be forgotten, the right to restriction of processing, etc.), personal data will be transferred to a dedicated encrypted digital and/or paper archive (protected archive), making it accessible exclusively to the Data Controller, or it will be destroyed without leaving any copies, unless otherwise provided by applicable law.

A periodic annual review of the data processed is expected, as well as the possibility of deleting it if no longer necessary for the intended purposes.

5. Access to data (categories of recipients to whom data may be disclosed)

We also inform you that the data collected will never be disseminated or shared without your explicit consent, except for necessary communications that may involve the transfer of data to public bodies, consultants, or other parties for the fulfillment of tax and legal obligations or for the fulfillment of the purposes (where authorized), subject to our prior letter of engagement imposing a duty of confidentiality and security on the processing of personal data.

With reference to Art. 13, paragraph 1, letter a) of the GDPR, 1 letter e) of the EU Regulation, we indicate the entities or categories of entities (duly identified and trained) who may become aware of your personal data in their capacity as data processors or persons in charge of processing. A specific list by category is provided below:

- Partners, employees, collaborators, and suppliers of the Data Controller in Italy and abroad, in their capacity as data processors (e.g., sales, technical, administrative, legal, press offices; system administrators, external professionals, various service providers, etc.)

- Partner companies of the undersigned (without whose activities contractual obligations cannot be fulfilled) in their capacity as data processors.

Your personal data may also be disclosed to external parties who are recipients of the practices concerning you, in the performance of the activities and to external parties who interact with the undersigned, always and exclusively for activities functional to the purposes described above, external parties called upon to

perform specific tasks on behalf of the Data Controller, in their capacity as data processors, pursuant to art. 28 of the EU Regulation.

For brevity's sake, a detailed list of these figures is available at our office and is at your disposal.

6. e 7. Communication and Transfer of Data

Without the need for express consent (Article 6, paragraph 1, letters b), c), and f) of the EU Regulation), the Data Controller may communicate your data for the purposes referred to in points 2A to 2F to supervisory bodies, judicial authorities, as well as to those entities to whom communication is mandatory by law for the fulfillment of the purposes indicated above.

These entities will process the data in their capacity as independent data controllers.

Personal data is stored on devices located at the Data Controller's headquarters or with providers within the European Union.

Your data will not be disclosed.

To ensure the security of such transfers, we only use entities that offer the necessary guarantees to implement adequate technical and organizational measures so that the processing complies with the provisions of EU Regulation 679/2016.

The Data Controller has implemented appropriate technical and organizational measures to ensure an adequate level of security for both the data stored on its devices and any data stored at providers, in full compliance with the provisions of the EU Regulation

8. Nature of data provision and consequences of refusal to respond

The provision of data for the purposes referred to in points 2A to 2F of this policy is necessary for the establishment of the contractual relationship and the proper performance of the contract. We inform you that if you refuse to provide such data or if you fail to authorize its processing for these purposes, it will be impossible for our Company to fulfill its legal and contractual obligations with you.

In this case, failure to provide such data will make it impossible to establish or continue the contractual relationship, to the extent that such data is necessary for us to properly fulfill the obligations related to the management of the contract.

9. Rights of the Data Subject

As a data subject, you have the rights set forth in Articles 15 to 22 of the EU Regulation, as set out below, and specifically, you have the right to:

- obtain confirmation of the existence and processing of personal data concerning you, as well as a written (electronic) copy thereof in a clear and comprehensible form (so-called right of access);
- obtain information regarding the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be disclosed, and, where possible, the retention period;
- obtain the rectification of data concerning you (so-called right to rectification);
- obtain the erasure of data concerning you (so-called right to be forgotten);
- obtain restrictions on processing (so-called right to restriction of processing);
- if the data is not collected from the data subject, obtain all available information on its source;
- obtain data portability, i.e., receive data from a data controller in a structured, commonly used, and machine-readable format and transmit that data to another data controller without hindrance (so-called right to data portability);
- object to processing at any time, including processing for direct marketing purposes (so-called right to object). We specifically and separately inform you, as required by Article 21 of the EU Regulation, that if personal data are processed for direct marketing purposes, the data subject has the right to object at any



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time to processing of personal data concerning him or her for such purposes, and that if the data subject objects to processing for direct marketing purposes, the personal data may no longer be processed for such purposes;

- object to automated individual decision-making, including profiling;
- withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- lodge a complaint with a supervisory authority (Italian Data Protection Authority).

There may be conditions or limitations to the data subject's rights. Therefore, it is not certain that, for example, the right to data portability will be available in all cases; it depends on the specific circumstances of the processing activity

10. Modalità di esercizio dei diritti

You may exercise your rights at any time by sending, without any formality, a clear communication to this effect: an e-mail to info@metalliestrusi.it.

11. Personal data not obtained from the data subject

It may happen that we are not the data controller to whom you provided your personal data, but are a joint data controller or external data processor, and therefore your data may have been disclosed to us as a result of a contract between the parties. In this case, we will do everything possible to ensure that you have been informed and have consented to the processing. You may ask us at any time to determine the source of your data.

12. Minors

The services offered by the Data Controller and the subject of the existing relationship with you do not involve the intentional acquisition of personal information relating to minors except to fulfill your request and fulfill the existing assignment/contract. In the event that information on minors is inadvertently recorded, the Data Controller will delete it promptly, upon request of the data subject.

13. Data Controller, Persons in Charge of Data Processing, and Processors

Below, we provide you with some information that is necessary for your attention, not only to comply with legal obligations, but also because transparency and fairness towards our customers are a fundamental part of our business.

Data Controller. The Data Controller of your personal data is Metalli Estrusi SpA. Responsible for the legitimate and proper use of your personal data, you may contact us for any information or request at the following numbers: telephone +39 030 2185100, e-mail: info@metalliestrusi.it.

Processors The updated list of data processors is kept at the Data Controller's headquarters.

Data Processors For the sake of brevity, the detailed list of these individuals is available at the Data Controller's headquarters and is at your disposal.

Data Controller

Metalli Estrusi SpA

The consent form for this privacy policy follows.



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Consent of the data subject to the processing of his/her data

The undersigned _____, having acquired the information provided by the Data Controller METALLI ESTRUSI SPA. pursuant to Articles 13 and 14 of EU Regulation No. 679/2016, declares that he/she has read the information provided by the undersigned and consents to the Data Controller processing his/her personal data in the manner and for the purposes indicated in the information (points 2A to 2F), and to its communication and storage in the manner and for the periods indicated in the information. Please note that, as indicated in the privacy policy, the processing of the information set out in points 2A to 2F does not require consent (Article 6, paragraph 1, letter f, recitals 47, 48, and 113 - Article 6, paragraph 1, letter b - Article 6, paragraph 1, letter c, EU Regulation).

By signing this document, I declare that I have carefully read the information provided by you pursuant to Articles 13 and 14 of EU Regulation no. 679/2016 and Legislative Decree no. 196/2003, as amended by Legislative Decree no. 101/2018, and that I have received a copy..

Date: ____/____/____

Signature
