

FEDRIGONI

SELF-ADHESIVES

FEDRIGONI GROUP PRIVACY NOTICE

Websites, Newsletters and Digital Communications

1. Who we are

Fedrigoni S.p.A., with registered office in **Piazzale Lodi 3, Milan, Italy**, and, where applicable, the relevant Fedrigoni Group company with which you interact (collectively or individually, as applicable, “**Fedrigoni**”), processes personal data in accordance with Regulation (EU) 2016/679 (“**GDPR**”) and applicable data protection legislation.

Depending on the relevant website, service or business relationship, the identity of the relevant data controller may also be indicated in the specific website, form or communication through which your personal data are collected.

For any privacy-related request, you may contact us at privacy@fedrigoni.com.

2. Personal data we may process

Depending on how you interact with us, we may process the following categories of personal data:

- identification and contact information, such as name, surname, e-mail address, telephone number, company, job title and country;
- information provided when you submit a request or contact us through our websites or other communication channels;
- professional and business contact information;
- information relating to your registration for events, initiatives or restricted areas of our websites;
- technical information generated when you use our websites, such as IP address, device or browser information and other navigation data, to the extent permitted by applicable law;
- information relating to your subscription to, or preferences concerning, newsletters and other commercial communications.

Where we collect information about the performance of our newsletters and digital communications, we apply the principles described in Section 4 below.

FEDRIGONI
Self-Adhesives
Ritrama S.p.A.
Registered and head office
Offices and slitting
and distribution centers
Via Senatore Simonetta 24
20867 Caponago, Italy
T +39 02 955 459 1
F +39 02 955 459 01

Share capital
€ 9.000.000 i.v.
VAT number IT 01676140153
Sole shareholder Fedrigoni S.p.A.
Business register MB
Monza e Brianza
Comp. Reg R.E.A. N. 1871535
info.caponago@fedrigoni.com
fedrigoni.com

Production sites
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20060 Basiglio (MB), Italy
T +39 02 923 948 1
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Polo Ind.le Berbentina
60041 Sassoferrato (AN), Italy
T +39 073 297 061
F +39 073 296 436

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3. Purposes and legal bases of processing

We process personal data only where we have an appropriate legal basis and for the following purposes.

A. Website and account management

Where our websites enable users to create an account or access reserved content, we process the data necessary to register and manage the relevant account and provide the requested service.

The legal basis depends on the service concerned and may include the performance of a contract or pre-contractual measures, or consent where required by applicable law.

B. Requests and communications

When you contact us, complete a form or otherwise send us a request, we process the information you provide in order to respond to and manage your request.

The legal basis may be the performance of pre-contractual measures requested by you, the performance of a contractual relationship, our legitimate interest in managing communications relating to our business, or consent where required.

C. Professional and business relationships

We may retain and use professional contact details relating to customers, prospective customers, suppliers, business partners and their representatives in order to establish, maintain and manage our professional and commercial relationships.

Where applicable, such processing is based on the performance of a contract or pre-contractual measures, or on Fedrigoni's legitimate interest in managing and developing its professional and business relationships.

D. Newsletters and commercial communications

We may use your contact details to send newsletters, information about Fedrigoni products and services, company news, invitations, surveys and other relevant commercial or professional communications.

Where required by applicable law, these communications are sent on the basis of your consent.

In the context of existing or prospective B2B relationships, we may also send professional or commercial communications on the basis of our legitimate interest in maintaining and developing our business

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relationships, where permitted by applicable law and taking into account the nature of the relationship and your reasonable expectations.

You can unsubscribe from marketing communications at any time, free of charge, by using the unsubscribe link included in each communication or by contacting privacy@fedrigoni.com.

Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

E. Events and initiatives

Where you register for an event, award, initiative or other Fedrigoni activity, we process your information in order to manage your registration and participation and, where permitted, to keep you informed about the relevant initiative or similar future initiatives.

The legal basis will depend on the relevant activity and may include performance of the requested service, legitimate interest or consent.

F. Website security and operation

Certain technical data may be processed to ensure the security, availability and proper functioning of our websites and information systems.

Such processing is based on Fedrigoni's legitimate interest in protecting its websites, information systems and users, where applicable.

4. Newsletter statistics and measurement

To understand whether our communications are relevant and useful to our audience and to improve their overall content and effectiveness, **Fedrigoni may measure interactions with its newsletters, including, for example, the overall number of clicks on links contained in a communication.**

Where this functionality is used for statistical purposes, **Fedrigoni uses aggregated and anonymised information and does not use such information to monitor individual recipients, create individual user profiles or make decisions concerning individual recipients.**

Statistics are used to understand, at an aggregate level, how audiences interact with a particular communication and which content generates greater interest.

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Fedrigoni applies data minimisation and privacy-by-design principles to such measurements and configures its systems, where technically possible, so that the reporting available to Fedrigoni does not identify individual recipients.

Fedrigoni does not use aggregated newsletter statistics to carry out individual profiling or behavioural advertising.

Where a technology used in connection with electronic communications constitutes a tracking technology requiring consent under applicable law, Fedrigoni will use such technology only in accordance with the applicable consent requirements and will provide the recipient with the controls required by law.

You may in any event choose at any time not to receive further newsletters or marketing communications by using the unsubscribe functionality included in every such communication.

5. Cookies and similar technologies

Our websites use cookies and similar technologies for strictly necessary purposes and, subject to your choices and where required by law, for analytics, functionality and other purposes.

Detailed information about the technologies used on each website, their purposes, duration and the parties involved is available in the relevant **Cookie Policy and cookie preference management tool** accessible from that website.

You may modify your cookie preferences at any time through the relevant cookie management tool.

6. Recipients of personal data

Personal data may be processed, to the extent necessary for the purposes described above, by authorised personnel of Fedrigoni and by companies belonging to the Fedrigoni Group.

We may also use selected service providers acting on our behalf, including providers of:

- IT and website management services;
- hosting and cloud services;
- newsletter and mailing-list management services;
- communication and marketing technology services;
- event management services; and
- other services necessary to operate our websites and communications.

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Where required, such providers process personal data on our behalf pursuant to appropriate contractual arrangements and data protection obligations.

Personal data are not disclosed or disseminated to third parties except where required by law or necessary for the purposes described in this Notice.

7. International transfers

Where personal data are transferred outside the European Economic Area, Fedrigoni implements the safeguards required under applicable data protection legislation, including, as appropriate, adequacy decisions adopted by the European Commission or appropriate safeguards under Articles 46 and 47 GDPR.

8. Data retention

We retain personal data only for as long as necessary for the purposes for which they were collected and in accordance with applicable legal requirements.

In particular:

- account information is retained for as long as necessary to provide and manage the relevant service;
- communications and requests are retained for the period necessary to manage the relevant request and any related relationship;
- professional contact details and B2B communication data may be retained for **36 months from the last professional contact**, unless a longer period is justified by an ongoing contractual relationship or applicable legal requirements;
- newsletter subscription information is retained until you unsubscribe or withdraw your consent, subject to any information that must be retained to document your preferences and ensure that no further unwanted communications are sent;
- anonymous and aggregate statistics may be retained for statistical purposes where they no longer constitute personal data.

9. Your rights

Subject to the conditions provided by applicable law, you may exercise your rights under the GDPR, including the rights to:

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- obtain confirmation as to whether your personal data are being processed and access such data;
- request rectification of inaccurate or incomplete personal data;
- request erasure of your personal data;
- request restriction of processing;
- receive your personal data in a structured, commonly used and machine-readable format, where applicable;
- object to processing based on legitimate interest;
- withdraw consent at any time where processing is based on consent, without affecting the lawfulness of processing carried out before withdrawal.

You may exercise your rights by contacting privacy@fedrigoni.com.

You also have the right to lodge a complaint with the competent data protection supervisory authority.

10. Updates to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our processing activities, technologies or applicable legal requirements.

The most recent version will be made available on the relevant Fedrigoni website.

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