

**Acciaieria Arvedi S.p.A.**

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Cap.Soc. € 112.900.000  
interamente versato  
Società soggetta all'attività di  
direzione e coordinamento di  
Finarvedi SpA  
Società con Socio Unico

Part.IVA IT 11852670154  
Cod.fisc. 00910070192  
Reg.Imp.MI 00910070192  
REA MI 1497770  
www.arvedi.it

**AcciaieriaArvedi**

## PRIVACY POLICY PURSUANT TO ARTICLE 13 OF THE EU REGULATION 2016/679 ON THE PROCESSING OF PERSONAL DATA

Dear Customer/Supplier,

Acciaieria Arvedi SpA (hereinafter referred to as “**Data Controller**”) informs, pursuant to Article 13 of EU Regulation no. 2016/679 (hereinafter referred to as “**GDPR**”), that the personal data provided will be processed in the forms and within the limits provided for by the regulations dictated by the GDPR concerning the protection of individuals with regard to the processing of personal data and the free movement of such data. The processing of personal data will be based on the principles of fairness, lawfulness, transparency, purpose limitation and storage, minimisation and accuracy, integrity and confidentiality, as well as on the principle of accountability set out in Article 5 of the GDPR.

We also inform you that:

A) The Data Controller is Acciaieria Arvedi SpA (DATA CONTROLLER).

B) The Data Controller processes the personal data supplied on signing a commercial contract with the Data Controller (surname name/company name in the case of a legal entity, address, tax code/VAT number, e-mail, telephone number) and the bank data necessary for payment for the service/supply (DATA SUBJECT TO PROCESSING).

C) The personal data collected by the Data Controller are processed for the purposes described below:

- a. purposes related to the management of the contractual/commercial relationship;
- b. purposes of an administrative - accounting nature, such as invoicing, management of payments, delays and non-payments;
- c. fulfilment of obligations or exercise of rights under national or European Union law or collective agreements in accordance with national law;
- d. purposes of credit management and litigation;
- e. purposes of preventing computer fraud relating to electronic payment methods, through the CBI Globe System consultation service (PURPOSE OF THE PROCESSING).

D) The processing is lawfully carried out insofar as it is necessary for the performance of the contract and/or pre-contractual measures, for the fulfilment of legal obligations. For the pursuit of its own legitimate interest or that of third parties for the purposes of fraud prevention, the Data Controller may use the Check IBAN CBI service by communicating your IBAN and tax code to Nexi Payments SpA, CBI and the Bank where the account is opened (all independent data controllers) who will process the data for verification and communication of their correctness. Detailed information on the CBI Check IBAN service is available at [www.nexi.it/privacy.html](http://www.nexi.it/privacy.html) (LEGAL BASIS OF THE PROCESSING).

E) Personal data are processed within the territory of the European Union. The processing of personal data includes collecting, recording, organising, storing, consulting, processing, modifying, selecting, extracting, comparing, using and communicating; at the initiative of the data subject, it may also include erasure and destruction. Personal data are processed mainly in automated and digital form, but also in paper form, with logic strictly related to the aforementioned purposes. The Data Controller adopts appropriate security measures to prevent the loss of data, and to protect them from unlawful or incorrect use and unauthorised access (PROCESSING METHODS).

F) Personal data may be disclosed to the following parties exclusively for the purposes described and in compliance with the rules set out in the GDPR: *i*) persons specifically appointed by the Data Controller; *ii*) competent authorities (e.g. judicial and/or police authorities) that make a formal request; *iii*) entities and/or associations to which the Data Controller adheres; *iv*) data processors duly appointed by the Data



Controller pursuant to Article 28 of the GDPR; *v)* credit and/or insurance institutions; Nexi Payments SpA, CBI and the Bank of origin of the current account with reference to the CBI Check IBAN service. The Data Controller may process personal data autonomously or jointly with other companies of the Arvedi Group to which it belongs, with which a co-ownership agreement and/or other agreement regulating the management of personal data has been signed (RECIPIENT OD DATA PROCESSING). G) Acciaieria Arvedi SpA and Finarvedi SpA process, depending on the specific purposes pursued and indicated in the present information notice, your personal data independently or jointly, on the basis of a co-ownership agreement.

As far as processing activities by means of Information Systems are concerned, Acciaieria Arvedi SpA and Finarvedi SpA act as joint owners and have determined their roles with regard to the submission of information, as well as for the purposes of timely feedback in the event of the exercise of rights by the person concerned (CO-CONTROLLER OF DATA PROCESSING).

H) Some personal data may be shared with recipients located outside the European Economic Area. Should this occur, the Data Controller hereby ensures that the processing of personal data by these recipients will be in compliance with the GDPR. Indeed, transfers may be based on an adequacy decision or Standard Contractual Clauses approved by the Commission of the European Union (TRANSFER OF DATA ABROAD).

I) Personal data are processed for the period of time strictly necessary to fulfil the purpose, which is the minimum necessary, as indicated by Consideration 39 of the GDPR, i.e. until the termination of the existing contractual relationship between the data subject and the Data Controller, without prejudice to a further retention period that may be imposed by law, as provided for in Consideration 65 of the GDPR. In all other cases, the Data Controller may process the personal data until the data subject communicates his or her wish to withdraw consent for any or all of the purposes for which it was requested (DATA RETENTION).

J) The person whose personal data are processed by the Data Controller has the right to request from the Data Controller access to and rectification or erasure of personal data; to limit data processing to the purposes strictly necessary; to object to processing; to obtain the direct transmission of personal data from one Data Controller to another where technically feasible; to withdraw consent to processing at any time without prejudice to the lawfulness of processing based on consent given prior to revocation and, in any case, in cases where consent was the legal basis for processing; to lodge a complaint with a supervisory authority. The aforementioned rights may be exercised by written communication to be sent by registered letter with advice of receipt to Acciaieria Arvedi SpA, Via Acquaviva n. 18 - 26100 Cremona, or to Finarvedi SpA, Piazza Lodi n. 7 - 26100 Cremona, or by email to: [privacy@arvedi.it](mailto:privacy@arvedi.it) (RIGHTS OF THE INTERESTED PARTY).

Cremona, 29 May 2024

**The Data Controller**  
**Acciaieria Arvedi SpA**