

PRIVACY POLICY FOR THE PROCESSING OF PERSONAL DATA

Pursuant to Article 13 of EU Regulation 2016/679

This policy describes the operations performed on the personal data of users collected by the site on the occasion of:

- Access and/or registration to the reserved area
- Subscription to the newsletter
- Sending information requests through the contact form or sending an email to one of the indicated addresses
- Sending one's CV

This is an information notice also provided pursuant to Article 13 of EU Regulation 2016/679 to those who interact with the web services of FM METAL FASTENERS GROUP S.p.A., accessible electronically from the address: www.fmspa.com

The information is provided only for the site of FM METAL FASTENERS GROUP S.p.A. and not for other websites or social pages that may be consulted by the user via links.

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THE "DATA CONTROLLER"

Following consultation of this site, data relating to identified or identifiable persons may be processed. FM METAL FASTENERS GROUP S.p.A., with registered office at Via Emilio Villa, 3 – 42124 Reggio Emilia (RE), is the Data Controller of the personal data of users collected during the use of the Site's Services. FM METAL FASTENERS GROUP S.p.A. will process personal data for the following purposes:

- Management of registrations to the reserved area
- Management of order requests
- Sending newsletters
- Management of information requests
- Management of received CVs
- Management of administrative-accounting and tax activities
- Management of requests to exercise rights
- Ascertainment, exercise, or defense of a right

TYPES OF DATA PROCESSED Browsing data.

The computer systems and software procedures used to operate this website acquire, during their normal operation when loading the site in the browser, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of the computers used by users who connect to the site, addresses in URI (Uniform Resource Identifier) notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters related to the user's operating system and computer environment. These data are used only to obtain anonymous statistical information on the use of the site and to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site: except for this possibility, the data on web contacts do not persist.

DATA PROVIDED VOLUNTARILY BY THE USER

The optional, explicit, and voluntary sending of emails to the addresses indicated on this site or through the completion of the appropriate contact form entails the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message. Specific summary information will be reported or displayed on the pages of the site prepared for particular services on request.

Cookies For information on the cookies present on the website, please refer to the Cookie Policy.

OPTIONAL PROVISION OF DATA

Apart from what is specified for browsing data, the user is free to provide or not provide personal data when necessary in specific sections of the site. Failure to provide them may make it impossible to obtain what is requested. This policy indicates, for each processing, the consequences of any refusal to provide personal data.

REDIRECTING TO EXTERNAL WEBSITES OR SOCIAL PAGES

This website uses social buttons. Social share buttons are buttons that can be placed in different points of the web page and within the footer. They allow the user to easily and directly reach the related company social page. This connection works by redirecting to the selected social platform. All social buttons on the site are marked with the respective logo owned by the social network platform. For information on the purposes, type, and methods of collection, processing, use, and storage of personal data by the social network platform, as well as the methods through which to exercise your rights, please refer to the Privacy Policy of the social network also present within our Cookie Policy. This website does not contain redirect links to other external websites.

PROCESSING METHODS

Personal data are processed with electronic tools for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures are observed to prevent data loss, illegal or incorrect use, and unauthorized access.

1. Data processing for access to the reserved area

FM METAL FASTENERS GROUP S.p.A. will process the user's personal data to allow access to the "Reserved Area" of the website and the use of services reserved for registered users, including the possibility of making an online order request for products of interest provided by FM METAL FASTENERS GROUP S.p.A., to allow the conclusion of the purchase contract outside the website, the correct execution of the obligations arising from such contract, and finally, to execute the requests sent by the user. The legal basis for the aforementioned processing is the fulfillment of the contract or, depending on the case, the execution of pre-contractual measures adopted at the request of the data subject (Article 6 letter b of the GDPR). For these purposes, the data will be processed for the time strictly necessary to carry out the individual processing activities. FM METAL FASTENERS GROUP S.p.A. may, however, retain the data for the purposes and for the maximum retention periods indicated in this policy or in the cases established by the Regulation and/or the law. For this purpose, FM METAL FASTENERS GROUP S.p.A. will process the personal data of users to:

- Allow the user to access the website and navigate it
- Allow the user to access the "Reserved Area" through their account and use the services reserved for registered users, including the possibility of sending an order request through the site itself and possibly exercising the right of withdrawal
- Allow the user to access the site and navigate as a logged-in user, recognizing them regardless of the device used
- Maintain and manage the user's account
- Store data and information in the user's account (personal data, order history, any returns, delivery addresses, etc.)
- Execute the purchase/supply contract

The provision of data for the purpose in question is optional. However, since the processing is necessary to allow the user's registration, access to the reserved area, and/or the provision of account management and maintenance services created, as well as the sending of the order request through the site or to respond to pre-contractual requests made by the user, or the consideration of the CV sent, failure to provide the data will make it impossible for the user to access and/or navigate the site in the "reserved area" section, to register on the site itself and to use the services reserved for registered users and/or send an order request through the site, to receive responses to requests made and to be contacted for a personnel selection interview.

2. Processing of email addresses for sending newsletters

FM METAL FASTENERS GROUP S.p.A. will process the email addresses provided by the user at the time of subscription to the newsletter through the appropriate box in the footer of the site, to send promotional messages related to products, services, activities, and events of the Data Controller itself. The legal basis for this processing is consent (Article 6 letter a of the GDPR), to be freely provided before sending personal data. In case of failure to provide consent, promotional emails cannot be sent. The data subject may, at any time, revoke the consent given through the opt-out present in the footer of the communications or by writing to us:

- via email, at the address: fmreggioemilia@fmspa.com

For sending newsletters, FM METAL FASTENERS GROUP S.p.A. will process the user's data until the exercise of the right of opposition or revocation of consent.

3. Data processing through contact form

FM METAL FASTENERS GROUP S.p.A. will process the data voluntarily provided by users (name, surname, company, email address) by filling out the contact form or sending a message to one of the addresses indicated on the site to respond to requests. These data will be used only and exclusively to follow up on the information request, contacting the user through the contact details provided. The legal basis for this processing is the execution of pre-contractual measures adopted at the request of the data subject (Article 6 letter b of the GDPR).

For this purpose, FM METAL FASTENERS GROUP S.p.A. will process the user's data for the time necessary to carry out the requested activities. If the data is not provided, it will not be possible to send a request through the contact form.

4. Data processing within the "work with us" section

FM METAL FASTENERS GROUP S.p.A. will process the data voluntarily provided by users (suppliers, by filling out the appropriate form, and candidates for open positions, by sending a CV or cover letter via email) to follow up on the evaluation and selection of the candidate. These data will be processed solely and exclusively to proceed with the selection process and thus contact the candidate, schedule a meeting, and evaluate their application/job offer. The legal basis for this processing is the execution of pre-contractual measures (Article 6 letter b of the GDPR). For this purpose, FM METAL FASTENERS GROUP S.p.A. will process the user's data for the time necessary to carry out the personnel selection activities. If the data is not provided, it will not be possible to send a CV or cover letter through the appropriate section.

5. Data processing for assistance/customer care purposes (information request)

FM METAL FASTENERS GROUP S.p.A. will process users' data for general assistance and customer care activities and thus to respond to information requests from users or to respond to complaints, reports, disputes. The legal basis for this processing is the fulfillment of contractual obligations (Article 6 letter b of the GDPR). The provision of personal data for this purpose is optional. For this purpose, FM METAL FASTENERS GROUP S.p.A. will process the user's data for the time necessary to carry out the requested activities. If the data is not provided, it will not be possible to follow up on the request, as we will be unable to contact you.

6. Data processing for administrative-accounting and tax purposes

FM METAL FASTENERS GROUP S.p.A. will process users' data for the execution of administrative and/or accounting and/or tax obligations related to the provision of website services or the order request sent through it, such as, for example, keeping accounting records and issuing sales invoices. The legal basis for this processing is the fulfillment of legal obligations (Article 6 letter c of the GDPR) to which FM METAL FASTENERS GROUP S.p.A. is subject. The provision of data for this purpose is mandatory. Failure to provide the data will make it impossible for the user to use the website services and to complete the order submission through the site. The data will be stored and processed until the expiration of the legal terms provided for the performance of each administrative-accounting and tax obligation and/or for the retention periods provided by law for the storage of related documentation.

7. Data processing to allow the user to exercise rights

FM METAL FASTENERS GROUP S.p.A. will process users' data to:

- Respond to requests to exercise the right of withdrawal; requests to exercise the legal guarantee of conformity; other rights arising from the order request sent through the site and/or in relation to the provision of website services.
- Perform activities that are necessary as a result of the exercise of such rights.
- Receive and respond to requests to exercise data protection rights.

The legal basis for this processing is the fulfillment of legal obligations (Article 6 letter c of the GDPR) to which FM METAL FASTENERS GROUP S.p.A. is subject. The provision of data for these purposes is mandatory, as the processing is necessary to allow FM METAL FASTENERS GROUP S.p.A. to fulfill legal obligations and the user to exercise the rights granted by law. Failure to provide data for this purpose will make it impossible for the user to exercise such rights. For this purpose, FM METAL FASTENERS GROUP S.p.A. will store and process the data until the expiration of the legal terms provided for the exercise of the right or, in the case of the exercise of such rights, for the time necessary to manage and close the case; in the case of the exercise of rights provided by the GDPR, the data will be processed until the Data Controller certifies that the request has been fulfilled.

8. Data processing for the purpose of ascertaining, exercising, or defending a right

FM METAL FASTENERS GROUP S.p.A. will process users' data for the purpose of ascertaining, exercising, or defending a right in all competent venues. The legal basis for this processing is the legitimate interest of FM METAL FASTENERS GROUP S.p.A. (Article 6 letter f of the GDPR).

CATEGORIES OF SUBJECTS TO WHOM DATA MAY BE COMMUNICATED

Your data may be sent to the recipients or categories of recipients listed below:

- Authorized personnel of FM METAL FASTENERS GROUP S.p.A. responsible for managing order requests received from the site
- Carriers, shippers, couriers, postal services, logistics companies
- Banks and credit institutions
- Institutional subjects to whom the communication of data is mandatory or necessary in compliance with legal obligations or functional to the administration of the relationship
- Data processors

RIGHTS OF THE DATA SUBJECTS

Pursuant to Articles 15-21, 7, and 77 of EU Regulation 2016/679, the subjects to whom the personal data refer have the right at any time to obtain confirmation of the existence or otherwise of the same data and to know its content and origin, verify its accuracy or request its integration or updating, or correction, revoke the previously given consent, and lodge a complaint with the Data Protection Authority. Users also have the right to request the deletion, transformation into anonymous form, or blocking of data processed in violation of the law, as well as to oppose in any case, for legitimate reasons, their processing. Requests to exercise rights should be sent via email to: fmreggioemilia@fmspa.com

UPDATES AND MODIFICATIONS

This Privacy Policy is subject to changes, which will be published on this page and will indicate the date they come into effect. Last modification of the policy: 02/01/2025

This policy has been drafted on behalf of FM METAL FASTENERS GROUP S.p.A. by OI S.r.l.