

## PRIVACY POLICY FOR THE PROCESSING OF CUSTOMERS' PERSONAL DATA

Pursuant to Articles 13 and 14 of EU Regulation 2016/679 (GDPR)

### 1. DATA CONTROLLER AND CONTACT DETAILS

The Data Controller is Centro Style S.p.A., with registered office in Via G. D. Martinengo, 7 - Vedano Olona (VA). **Contact details:** Tel. +39 0332.270.270 – E-Mail: [privacy@centrostyle.it](mailto:privacy@centrostyle.it).

### 2. PERSONAL DATA PROCESSED, PURPOSE, LEGAL BASIS, AND RETENTION PERIOD

For the purposes of this policy, Centro Style S.p.A. considers a 'Customer' to be any natural or legal person who interacts with the company for commercial or contractual purposes, including potential customers, acquired customers, contacts coming from agents, the institutional website, the Registry Office, or Purchasing Groups or franchises, as well as any company representatives or contacts appointed to manage such relationships. The personal data collected will be processed exclusively for purposes related to the management of customer relationships and the contacts of company representatives, in full compliance with the principles of lawfulness, fairness, transparency, and protection of the rights of the data subjects.

Type of data	Purpose	Legal Basis	Duration
Identification and contact data (Company name, Tax code, VAT, address, phone, email, IBAN, etc.)	Collection and management of information for pre-contractual activities (quotes, offers, feasibility analysis)	Art. 6(1)(b) GDPR – Performance of pre-contractual activities	Until conclusion of negotiations; max 2 years if no contract is signed
Identifying and contact details of the Customer and company representatives	Contract execution, operational management of products/services, customer support, communication management	Art. 6(1)(b) GDPR – Performance of the contract	Maximum 10 years from the end of the contractual relationship
Pseudonymized data of the end customer	Management of requests regarding the end customer's medical devices		
Data necessary for legal obligations (e.g., fiscal, accounting)	Compliance with legal obligations arising from the provision of services/products	Art. 6(1)(c) GDPR – Legal obligation	Duration required by applicable regulations
Data for informative communications, newsletters, and promotional material (including profiled data)	Sending informative and promotional communications ; preference management	Art. 6(1)(a) GDPR – Express consent; Art. 6(1)(f) GDPR – Legitimate interest for internal analysis	Until withdrawal of consent

### 3. NATURE OF DATA PROVISION

The provision of personal data necessary for the management of the contractual relationship is mandatory. Any refusal to provide such data will result in the impossibility of starting or continuing the commercial relationship and the activities related to it. The provision of personal data aimed at receiving informative and promotional communications, including the newsletter, as well as data used for any profiling for personalized commercial purposes, is optional. Any refusal or subsequent withdrawal of consent does not affect in any way the execution of the contract or the provision of the requested services.

### 4. SCOPE OF COMMUNICATION AND RECIPIENTS

The data will be communicated to the minimum extent necessary for the achievement of the purposes, on the basis of the applicable legislation and/or a contractual agreement with the Controller, to:

- internal personnel authorized to process data for:
  - technical, commercial, logistics and administrative services
  - checks and supervisory activities (e.g. internal audits aimed at maintaining and improving management systems)
- providers of services connected and/or subsequent to the agreed services, who act as Data Processors, such as:
  - sector professionals (e.g. agents)
  - companies for the analysis of economic-financial information and creditworthiness
  - companies in charge of maintaining information systems and software
  - companies in charge of providing administrative, organizational and legal advice
  - companies that provide auxiliary and support services
- third parties operating as Independent Data Controllers, such as:
  - franchises and purchasing groups to which the customer belongs
  - public authorities, to the extent that this is required by applicable legislation or their orders, or for the exercise, establishment and/or defense of a right in court
  - banking institutions, any insurance companies, certification bodies, etc. that provide auxiliary support services

### 5. DISSEMINATION OF DATA

The data will not be subject to dissemination, except in cases provided for by law or necessary for the exercise of a right. No fully automated decision-making process is envisaged.

### 6. SOURCES

The data subject to processing may be acquired by Centro Style through the following methods:

- Directly from the Customer: for example via the institutional website, online forms, and other digital interactions;

- Through a reference figure of the Customer: such as agents, branch managers, or company contact persons;
- Commercial and promotional channels: franchises, purchasing groups, participation in trade fairs, events or sector demonstrations;
- Transmissions and transactions following the order: information collected in the context of orders, contracts, commercial or service communications

**7. DATA TRANSFERS TO THIRD COUNTRIES**

The management and storage of personal data take place on servers located within the European Economic Area, also through cloud services. The personal data provided will not be subject to transfer to third countries, i.e. outside the European Union or the European Economic Area. Any future needs for transfer to third countries will be subject to prior information to the data subject and will take place exclusively in compliance with the conditions of lawfulness provided for by articles 44 et seq. of Regulation (EU) 2016/679 (GDPR).

**8. DATA RETENTION PERIOD**

Personal Data will be processed for the time strictly necessary to achieve the purposes indicated in this information notice. In particular, the administrative documentation and the accompanying documentation will be kept for at least ten years from their issue, in compliance with applicable legal, fiscal and contractual obligations. Any data processed for promotional, informative or profiling purposes will be kept for shorter periods, compatibly with the consent expressed by the data subject, and will be deleted or anonymized upon expiry of the terms provided for.

**9. RIGHTS OF THE DATA SUBJECT**

Within the limits of the applicable legislation and pursuant to articles 15 et seq. of Regulation (EU) 2016/679, the data subject has the right to access their personal data, request their rectification or cancellation, oppose their processing for legitimate reasons or for direct marketing purposes, request their limitation and obtain the data concerning them in a structured format, commonly used and readable by an automatic device, thus exercising the right to data portability pursuant to art. 20 GDPR. The data subject also has the right not to be subject to decisions based solely on automated processes, including profiling, which produce legal effects or significantly affect the person, except in the cases provided for by the legislation. Requests can be addressed to the Data Controller through the Privacy Contact Person at the address [privacy@centrostyle.it](mailto:privacy@centrostyle.it) and will receive feedback without undue delay and in any case within 30 days of receipt, possibly extendable by a further 30 days in case of particular complexity, pursuant to art. 12, par. 3 of the Regulation. In the cases provided for, the data subject also has the right to lodge a complaint with the Data Protection Authority or to appeal to the competent judicial seats.

**ACKNOWLEDGMENT OF THE INFORMATION NOTICE**

The undersigned, \_\_\_\_\_, as a natural person/legal representative of \_\_\_\_\_, declares to have received and read the customer information notice of Centro Style SpA.

Place and date \_\_\_\_\_, Signature for acknowledgment (Company stamp and signature):

the \_\_\_\_/\_\_\_\_/\_\_\_\_

**CONSENTS FOR COMMERCIAL COMMUNICATIONS AND PROFILING**

COMPANY NAME	.....
TAX CODE AND VAT NUMBER	.....
MAIL PROVIDED FOR MAILINGS	.....@.....

**Express manifestation of consent is requested for the following activities – indicate with an X**

- I **consent** to receive informative notes and **promotional/commercial communications, including the Centro Style newsletter**, via e-mail, as indicated in this information notice.
- I **consent** to receive personalized informative and promotional/commercial communications (newsletter) based on my preferences and the **profiling** of my data, via e-mail, as indicated in this information notice.

The provision of data for such purposes is **optional** and can be **revoked** at any time without compromising the main contractual relationship