

## **Full Privacy Notice – Customers**

### **Who are we and what do we do with your personal data?**

Cartiere Carrara S.p.A., with registered office at Viale Spartaco Lavagnini No. 41, 50129 Florence (hereinafter also referred to as the “Controller”), in its capacity as data controller, is committed to protecting the confidentiality of your personal data and ensuring that such data is safeguarded against any event that could pose a risk of breach.

The Controller implements policies and practices regarding the collection and use of personal data, and the exercise of your rights under the applicable data protection legislation. The Controller regularly updates such policies and practices as necessary, particularly in the event of regulatory or organizational changes that may impact the processing of your personal data.

The Controller has appointed a Data Protection Officer (DPO) whom you may contact any questions concerning the adopted privacy policies and practices.

You may contact the DPO at:

**dpo@cartierecarrara.com**

### **How does the Controller collect and process your personal data?**

The Controller collects and/or receives the following categories of personal data about you:

- First and last name
- Tax code
- VAT number
- Place and date of birth
- Physical and electronic addresses
- Landline and/or mobile phone number
- Bank account details

Your personal data will be processed for the following purposes:

#### **1) Contract management and compliance with legal obligations**

Your personal data will be processed in order to carry out all activities connected to the establishment and management of the contractual relationship, including payment processing, handling of complaints, and compliance with legal obligations arising from the contract (e.g., data registration and storage).

Such legal obligations include, but are not limited to:

- Maintenance of accounting records.

Your personal data will also be processed to prevent contractual fraud. Additionally, your contact details (e.g., phone number and email address) may be used to provide you with customer service related to the contractual services.

You may also receive specific communications regarding contractual obligations, deadlines, service provision, or operational requirements. Such notices may be delivered, in compliance with principles of necessity, relevance, and proportionality, via paper correspondence, phone (landline/mobile including automated calls or SMS), or electronic mail.

## **2) Communication to third parties and recipients**

Your data will be disclosed to third parties or recipients solely where necessary in connection with the contract or in compliance with legal and/or regulatory obligations. Your data will not be disclosed for autonomous purposes of third parties unless:

1. You have given explicit consent;
2. Disclosure is necessary for contractual or legal obligations (e.g., to defend your rights or report to supervisory authorities);
3. Disclosure is made to tax authorities or public supervisory and control entities to whom the Controller is subject by virtue of its activities.

## **What happens if you do not provide your data?**

If you do not provide your personal data, the Controller will be unable to proceed with the processing necessary for contract management, provision of services, or compliance with related legal obligations.

The Controller may also process your data based on legitimate interests, provided such interests do not override your rights to privacy. These include:

- Preventing IT security incidents, reporting data breaches to authorities or affected individuals where required;
- Disclosing your data to third parties involved in the execution of contractual obligations.

## **How and for how long is your data stored?**

### **How**

Data processing is carried out using paper-based and digital tools by authorized and trained personnel. Access is granted only to the extent necessary for carrying out processing activities.

The Controller regularly verifies the systems and security measures in place and ensures they

are updated. The Controller also ensures that no unnecessary data is collected or retained, and that all data are stored with integrity and authenticity, and used strictly for the intended processing purposes.

### **Where**

Your personal data is stored in physical and electronic archives located within the European Economic Area (EEA).

### **For how long**

Your data is retained for the period necessary to manage the contractual relationship and for up to ten (10) years following its termination (Art. 2946 of the Italian Civil Code), or from the moment in which related rights may be enforced (pursuant to Art. 2935 Civil Code).

Data is also retained for compliance with obligations (e.g., tax and accounting) that persist beyond the end of the contract (Art. 2220 Civil Code), and only the data necessary for such purposes will be stored.

If legal claims arise, your data—only to the extent necessary—may be processed for the time required to pursue those claims.

You retain the right to object at any time to processing based on legitimate interests, on grounds relating to your particular situation.

## **What are your rights?**

At any time, and free of charge, you may:

- Obtain confirmation of whether your personal data is being processed;
- Access your data and obtain information on its origin (if not directly provided by you), processing purposes, recipients, retention period or criteria used to determine it;
- Withdraw consent where processing is based on it (without affecting the lawfulness of prior processing);
- Request rectification or update of inaccurate or outdated data;
- Request erasure of data where it is no longer necessary for the purposes for which it was collected, or where processing is unlawful, and if no other legitimate basis exists;
- Request restriction of processing in certain circumstances (e.g., during verification of contested accuracy);
- Receive your data in a structured, commonly used and machine-readable format, and transmit it to another controller (data portability), where processing is based on consent or contract and carried out by automated means.

The Controller shall respond to your request without undue delay and in any case within one month. This may be extended by two additional months in cases of complexity or high volume of requests. In such cases, you will be informed within one month of the request and provided with reasons for the delay.

For further information or to submit your request, please contact:  
[dpo@cartierecarrara.com](mailto:dpo@cartierecarrara.com)

## **How and when can you object to the processing of your personal data?**

You may object at any time to the processing of your data on grounds relating to your particular situation, where processing is based on legitimate interests or your consent. Please send your objection to: [dpo@cartierecarrara.com](mailto:dpo@cartierecarrara.com)

You are entitled to the erasure of your personal data where no overriding legitimate grounds exist, and in all cases where you have objected to the processing.

## **How can you lodge a complaint?**

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the competent supervisory authority—namely, the authority that carries out its duties in Italy (or in the Member State where you reside or work, or where the alleged infringement occurred), in accordance with Regulation (EU) 2016/679.

You will be promptly informed of any updates to this privacy notice through appropriate means, including if the Controller intends to process your data for purposes other than those described herein, allowing you time to provide consent if necessary.