ALFA ELECTRIC
THERMAL MANAGEMENT
ALFA ELECTRIC

ALFA PLASTIC S.A.S. di Fioratti Paolo & C.
Via Della Valle 39 – 20841 Carate Brianza (MB) –Italia
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www.alfaelectric.com - info@alfaelectric.com
C.F. e p. IVA IT 02348500964
R.E.A. Monza 1428534 – Registro A.E.E. IT08020000000315

PRIVACY POLICY WEBSITE
PURSUANT TO ART. 13 OF THE REGULATION (EU) 2016/679

CONTACT DETAILS

DATA CONTROLLER

Pursuant to Article 4(1)(7) of the GDPR, the data controller is **Alfa Plastic s.a.s di Fioratti Paolo & C.**, with registered office at Via della Valle No. 39, 20841, Carate Brianza (MB), Italian Tax Code and VAT No. 02348500964, represented by its legal representative pro tempore (hereinafter, the "*Data Controller*").
The Data Controller may be contacted at the following email address: info@alfaelectric.com.

INFORMATION ON DATA PROCESSING

CATEGORIES OF DATA

For the purposes indicated in the following section, the Data Controller will process the data subject's personal data belonging to the categories listed below:

- Common personal data: browsing data, personal identification data, contact details, data contained in the curriculum vitae and any other data voluntarily provided by the user.

COOKIES

For all information relating to cookies, please refer to the Data Controller's Cookie Policy, which is accessible through the footer of the website.

PURPOSES, LEGAL BASES, RETENTION PERIODS AND NATURE OF THE PROVISION OF DATA

The personal data listed in the previous section will be processed by the Data Controller for the following purposes:

a) **Website browsing, consultation of content, and detection and prevention of fraudulent activities or misuse that could damage the website or compromise its security**
   - Legal base: legitimate interest pursued by the Data Controller (Article 6(1)(f) of the GDPR);
   - Retention period: for the entire duration of the browsing session;
   - Nature of provision of data: necessary. Failure to provide the data would prevent the user from browsing the website and consulting its content.

b) **Management and fulfilment of contact, support and/or information requests submitted by the user, as well as all activities connected or related thereto**
   - Legal base: performance of a contract or implementation of pre-contractual measures (Article 6(1)(b) of the GDPR);
   - Retention period: until termination of the contractual relationship and for the following 10 years;
   - Nature of provision of data: necessary. Failure to provide the data would prevent the Data Controller from managing all activities connected with the request submitted by the user.

c) **Sending information, communications, notices, newsletters and/or materials for: (i) direct marketing activities, (ii) market research, (iii) direct sales, (iv) customer satisfaction surveys, (v) promotional, commercial and advertising purposes, or (vi) events and initiatives [by email or through any other communication method available to the Data Controller]**
   - Legal base: consent (Article 6(1)(a) of the GDPR);
   - Retention period: until consent is withdrawn;
   - Nature of provision of data: optional. Failure to provide the data would prevent the Data Controller from sending communications, newsletters and/or marketing materials to the data subject.

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METHODS OF DATA PROCESSING

Personal data will be processed in digital and/or paper form through company devices providing access to the company platforms. These platforms may be accessed exclusively by duly authorised employees and collaborators of the Data Controller, who may perform operations involving the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or any other form of making available, comparison or interconnection, restriction, erasure or destruction of personal data, as well as any other appropriate processing operation, in compliance with the applicable legal provisions necessary to ensure, among other things, the confidentiality, integrity and availability of personal data.

RECIPIENTS OF DATA

The personal data processed by the Data Controller for the purposes indicated above may be disclosed to the following categories of recipients, which will act as independent data controllers, joint controllers or data processors. A complete and up-to-date list of such recipients is available at the Data Controller's offices:

- Parties providing services or carrying out outsourced activities on behalf of the Data Controller;
- Competent authorities.

TRASFER OF DATA OUTSIDE THE EEA

The personal data processed for the purposes indicated above will not be transferred to countries outside the European Economic Area (EEA). Should such transfers occur by technological solutions whose providers are established in countries outside the EEA, appropriate measures and safeguards will be implemented in accordance with the applicable personal data protection legislation.

DATA SUBJECT'S RIGHTS

GENERAL RIGHTS

Regarding the personal data provided, the data subject may exercise, at any time and in accordance with the GDPR, the rights established therein and listed below:

- Right to withdraw consent (Article 7(3) of the GDPR): the right to withdraw consent previously given for processing purposes based on such consent;
- Right of access (Article 15 of the GDPR): the right to obtain confirmation as to whether personal data is being processed and to receive a copy of such data in an intelligible form;
- Right to rectification (Article 16 of the GDPR): the right to obtain the rectification of inaccurate personal data;
- Right to erasure (Article 17 of the GDPR): the right to obtain the erasure of personal data;
- Right to restriction of processing (Article 18 of the GDPR): the right to obtain restriction of processing, for example, where the accuracy of the data is contested or where the processing is unlawful;
- Right to data portability (Article 20 of the GDPR): the right to receive personal data in a structured, commonly used and machine-readable format and to transmit such data to another data controller without hindrance;
- Right to object (Article 21 of the GDPR): the right to object to the processing of personal data;
- Right not to be subject to automated decision-making (Article 22 of the GDPR): the right not to be subject to a decision based solely on automated processing.

The above rights may be exercised in writing by sending an email to the Data Controller using the contact details provided above. Further information regarding the processing of personal data may be requested at any time. The exercise of these rights must not adversely affect and/or prejudice the rights and freedoms of others. The Data Controller undertakes to respond to requests within one month. In the case of particularly complex requests, this period may be extended up to a maximum of three months. In any event, the Data Controller will explain the reason for the extension within one month of receiving the request. The outcome of the request will be provided in writing or in electronic format and, in the latter case, free of charge.

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The Data Controller specifies that a reasonable fee may be charged where requests are manifestly unfounded, excessive or repetitive. For this purpose, the Data Controller will keep a record of the requests received. In accordance with Article 19 of the GDPR, the Data Controller undertakes to notify the recipients to whom the data subject's personal data has been disclosed of any rectification, erasure or restriction of processing requested by the data subject, where this is possible.

RIGHT TO LODGE A COMPLAINT WITH THE SUPERVISORY AUTHORITY

If the data subject believes that their rights have been compromised or infringed, or that the processing of their personal data is contrary to the applicable legislation, they have the right to lodge a complaint with the Italian Data Protection Authority, following the procedures indicated by the Authority at the following link: https://www.garanteprivacy.it/diritti/come-agire-per-tutelare-i-tuoi-dati-personali/reclamo.

FINAL PROVISIONS

The Data Controller may amend and/or supplement this Privacy Policy, including because of any subsequent amendments and/or additions to the applicable legislation. In such cases, the new version of this Privacy Policy will be communicated as soon as possible through methods designed to reach all data subjects promptly.

This Privacy Policy was approved by the Data Controller on the 3rd of September 2026.