NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF THE GDPR 2016/679

This notice on the processing of personal data ("Privacy Policy") explains how **FAS INTERNATIONAL S.p.A.** uses your information and applies to everyone who uses our website.

1. Who is the Data Controller?

FAS INTERNATIONAL S.p.A.

with headquarters in Schio (VI)

Via Lago di Vico, 60

VAT number 02081960243

The company can be contacted at info@fas.it

2. What personal data do we collect?

We may collect the following categories of personal information from and about you:

- information on Internet and network activities: this may include information on browsing behaviour, search history and interactions with websites and advertisements, including data from cookies and pixel tags;
- contact details: such as name, surname, telephone number, email address;
- commercial information: such as information relating to pre-contractual and/or contractual relations;
- if you apply for job vacancies, we may process personal, contact, educational and professional data, and if applicable, other specific data.

3. How do we collect your information?

Your personal data may be collected through various channels:

- <u>directly from the user</u>: we collect data when you use the website or interact with us in other ways, including through the website;
- via your device: when you use the site, we may collect information about the devices you use to
 access it, including hardware model, operating system and version, Internet Protocol (IP) address
 and other unique device identifiers, mobile network information, and device interaction
 information;
- <u>through tracking systems</u>. We may also collect data through tracking systems. For more information regarding this, please refer to the dedicated <u>Cookie Policy</u>.

4. For what purposes do we process your personal data?

- Browsing data may be processed in order to:
 - o enable and monitor the proper functioning of the website, carry out maintenance activities;
 - o obtain anonymous statistical information regarding the use of the site;
 - ascertain any potential liability in the event of hypothetical virtual crimes that are detrimental to the site, and accordingly, to exercise and/or defend the Data Controller's rights in court.
- The data provided by the user by filling in the contact form are processed in order to respond to their request.
- Data regarding the selection of staff are processed in relation to any pre-contractual relations that may be established as a result of the selection process.

5. What condition makes the processing of personal data lawful?

- The data processing operations necessary in order to enable use of the site are based on the implementation of a contract to which the data subject is party.
- Data processing for profiling purposes is based on the consent provided, as established in the Cookie Policy.
- The processing of personal data relating to personnel selection is based on the implementation of pre-contractual measures taken at the request of the person concerned.
- Data may be processed for legal reasons or for the legitimate interests of the Data Controller.

6. Why is it necessary to provide data?

Personal data must be provided in order to deliver the requested service (e.g. browsing the site, contact request, application, etc.). The data marked with a * are mandatory, the rest are optional.

7. To whom may we pass on your data?

As such, your data may be processed by our IT service providers or third parties. Certain subjects may be designated as Data Processors pursuant to Article 28 of the GDPR, such as natural and/or legal persons carrying out activities that are necessary in order to enable the aforementioned purposes to be achieved (e.g. suppliers of services for the management of the site, such as system outsourcers, companies dealing with Internet connectivity services, consultancy companies etc.).

Furthermore, the data may be communicated to autonomous data controllers, such as authorities and supervisory and control bodies entitled to request/receive the data.

8. Who is authorised to process personal data?

The data will be processed by employees of the company functions and by partners of the Data Controller tasked with carrying out the activities that enable the above-mentioned purposes to be achieved, and who have been expressly authorised to process this data and have received specific operational instructions in order to do so.

9. For how long do we process your data?

Personal data will be stored for different periods depending on the purpose for which they were collected:

- delivery of a service: we will keep the data for as long as is strictly necessary to fulfil the purpose in question. In any case, since the data processing is carried out for the provision of services, the Data Controller will avail itself of the option (as permitted by law), of retaining the personal data necessary to protect its own interests, for the time provided for by law.
- Personal data collected for staff selection purposes will be kept until this process is complete, or for 12 months after collection or participation in the staff selection activity.

10. Can your data be transferred abroad to non-EU countries?

Personal data are processed within the EU.

Where necessary, the data may be transferred to entities head-quartered in countries outside the European Union (EU) and the European Economic Area (EEA). For such countries, where not deemed adequate by the European Commission through an adequacy decision pursuant to Article 45 of the GDPR, the standard contractual clauses adopted by the European Commission pursuant to Article 46(2)(c) of the GDPR will be used as adequate safeguards, with the possible provision of "additional measures" to ensure a level of protection that is substantially equivalent to that required by EU law.

11. How do we process your personal data?

We have adopted specific security measures to prevent the loss of personal data, unlawful or improper use and unauthorised access, but please do not forget that it is essential for the security of your data that your device is equipped with tools such as an up-to-date anti-virus software, and that your Internet provider guarantees the secure transmission of data through firewalls, spam filters and similar safeguards.

12. What are your rights?

Data subjects may exercise the rights recognised in Articles 15-22 of the GDPR against the Data Controller, and in particular, may:

- request access to the data concerning them and to the information referred to in Article 15 (purpose of processing, categories of personal data, etc.);
- request deleted of the data in the cases provided for in Article 17, where the Data Controller no longer has the right to process this information;
- obtain the rectification of inaccurate data or the completion of incomplete data;
- request the restriction of data processing (i.e. the temporary submission of data for storage only), in the cases provided for in Article 18 GDPR; object at any time, in a manner that is easily accessible and free of charge, to the processing of data carried out on the basis of the legitimate interest of the Data Controller, for reasons related to the particular situation;
- receive the data in a structured, standardised electronic format, as well as where technically feasible to transmit the data to another Data Controller without hindrance,

where the processing is based on consent or contract and is carried out by automated means.

To exercise these rights, data subjects may contact the Data Controller at any time by sending their request by email to the above-mentioned address.

Data subjects have the right to lodge a complaint with the Data Protection Authority or, in any event, with the competent supervisory authority in the Member State where they normally reside or work, or in the state where the alleged infringement occurred.

We may update this Privacy Policy at any time and will notify you accordingly.

Updated September 2025