

PRIVACY POLICY

“DATA DISSEMINATION”

Lincotek Group S.p.A.

Privacy Policy & IT SECURITY: Our expertise at your service!



PRIVACY POLICY
PURSUANT TO ART. 13, RECITALS 60-62, OF THE REGULATION (EU) 2016/679 (GDPR)

	DATA CONTROLLER	<p>COMPANY NAME: Lincotek Group SpA</p> <p>Address of Registered office and Address of Head Office and Administrative headquarters: Via Mistrali 7 - 43046 Rubbiano di Solignano Parma (Province of Parma -Italy)</p> <p>Phone: +39 0525-305808 Email: group@lincotek.com Certified email address: lincotekgroup@pec.lincotek.it</p> <p>VAT number and tax code: IT 02657910341 Authorised Share Capital 376,361.00 Paid-up Share Capital 354,889.00 Economic Administrative Index No. PR 256485</p> <p>www.lincotek.com</p> <p><u>Sector and activity:</u> Financial Holding Company. Activities of the affiliated companies: providing special services in niche markets such as gas turbines for power generation aviation and medical devices.</p>
	DATA PROTECTION OFFICER (DPO)	<p>Francesco Traficante Via Mazzini 19b, 21052 Busto Arsizio (VA) - Italy Mail privacy@lincotek.com</p>

	<p>PRINCIPLES</p> <p>One of our main goals is to protect Personal Data.</p> <p>Personal data are processed lawfully, fairly and in a transparent manner, and they shall be adequate, relevant and limited to the minimum necessary and, where necessary, kept up to date and collected for specified, explicit and legitimate purposes pursuant to Articles 5 and 6 of EU General Data Protection Regulation 2016/679 (GDPR) following consent if so required. Personal Data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing, and against accidental loss, destruction or damage, by taking suitable technical and organisational measures (Integrity and Confidentiality).</p> <p>In case of substantial modification to this Privacy Policy and to the related data processing the User shall be informed and shall have the right to decide whether or not to authorize us to process his/her personal data for the purposes set out below.</p>
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	<p>SOURCES OF PERSONAL DATA</p> <p>Personal data collected from the Data Subject:</p> <ul style="list-style-type: none"> Data Controller's main offices;
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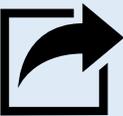
	<p>CATEGORIES OF DATA SUBJECTS</p> <ul style="list-style-type: none"> Users: legal persons and other professionals, including the personal data of the workers and persons treated as such, corporate representatives, shareholders of the companies that are already customers of ours or potential ones. Employees and Persons treated as such: permanent employees or employees on a fixed-term contract, interns, trainees, etc.; Corporate representatives: professionals who hold management positions, regardless of whether they are employed under a contract of employment or not, including, by way of example, directors, statutory auditors, managers, advisers, etc.; Shareholders: persons who hold at least a 10% equity stake in a company;
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	<ul style="list-style-type: none"> • Agents and other Qualified Persons: persons who promote and conclude contracts. • Supplier (Active Suppliers, Potential Suppliers, Former Suppliers): legal persons and other sector operators/professionals,
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	CATEGORIES AND PERSONAL DATA PROCESSED
	<ul style="list-style-type: none"> • COMMON PERSONAL DATA: Personally identifiable information: Name and Surname, Job Title. • SENSITIVE PERSONAL DATA (or data that might reveal sensitive information): Audio video images.

	DATA PROCESSING		DESCRIPTION OF PURPOSE AND LAWFULNESS OF PROCESSING		DURATION OF THE PROCESSING AND DATA RETENTION PERIOD*
1. Data dissemination			<p>Purpose of data dissemination for:</p> <ul style="list-style-type: none"> • Technical, promotional and advertising information notices on the objects of the Data Controller: images, photographs, audio and video recordings relating to the performance of the work and additional activities, also posted on the Data Controller's web pages and/or social media, or published on brochures, on billboards or business cards, or used during exhibitions and/or conferences, competitions, and so on, including their use in company profiles available to users to promote knowledge and relationships between them. • The Data Controller shall not use the images where such use would be detrimental to the honour, reputation and decorum of the Data subject (Art. 97 of Italian Law 33/41 and Art.10 of the Italian Civil Code). <p>Lawfulness of processing:</p> <ul style="list-style-type: none"> • Consent (optional and revocable at any time); 		<ul style="list-style-type: none"> • Duration of the processing and retention period for a maximum period of 24 months after termination of the contractual relationship/assignment. • Duration of the processing and retention period for a maximum period of 6 months after withdrawal of consent, in order to allow those activities necessary to erase personal data or to block processing and/or to anonymize personal data (data reduction), including those activities that are strictly necessary to pursue the purposes determined prior to Data subject's consent withdrawal. Consent shall therefore be deemed to be withdrawn for all activities subsequent to such withdrawal. • After the expiry of these time limits immediate deletion of data takes place.
2. Communication between the Group companies			<p>Transfer of personal data for administrative-accounting and commercial purposes (Data dissemination) within the companies of the multinational group.</p> <p>Lawfulness of processing:</p> <ul style="list-style-type: none"> • Legitimate interest; • Consent is not required. 		<ul style="list-style-type: none"> • Contract duration (for the Data Controller) and upon termination. Data retention occurs in compliance with the legal requirements in force in the Country of location (of the Recipient of the communication or Parent Company).

	CONTACT METHODS AND COLLECTION
	<p>Automated contact methods:</p> <ul style="list-style-type: none"> • Photographs and audio and video recordings.

	DATA RECIPIENTS
	<p>Data may be shared with and processed by external parties acting as Data Controller such as, by way of example:</p> <p>Italy:</p> <ol style="list-style-type: none"> Supervisory and monitoring Authorities and Bodies; Police and Judicial Authorities; Business transferees, transferees of a business branch, of legal relationships in bulk or of single legal relationships (for example the assignment of receivables or the transfer of contracts); Persons/entities providing professional consultancy services also in partnership.

European Union:

- e. Companies, even foreign ones, that are associated or belong to the Group or to the Parent company LINCOTEK GROUP S.P.A. (Italy), also considering the existence of telematic IT links or of correspondence (Lincotek Surface Solution – Lincotek Medical – Lincotek Equipment);
- f. As for the product Additive, data will be disclosed to the product Strategic Business Units *Surface Solution* and *Medical*, since these latter are involved in the manufacturing and distribution of the product;
- g. Persons/entities providing ICT services (Hosting/Data Center); companies within the LINCOTEK GROUP S.P.A. (Italy);
- h. Persons/entities providing ICT services (Hosting/Data Center);

Switzerland:

- i. Companies, even foreign ones, that are associated or belong to the Group or to the Parent company.

USA:

- j. Companies, even foreign ones, that are associated or belong to the Group or to the Parent company.

China:

- k. Companies, even foreign ones, that are associated or belong to the Group or to the Parent company.

Singapore:

- l. Other commercial parties authorized to distribute our products on the basis of their territorial competence corresponding to the same area to which the customer or the prospective customer belongs.

Personal data may also be processed by external parties appointed as Data Processors acting in the name and on behalf of the Data Controller. The appointed external Data Processor shall receive adequate operative instructions. The abovementioned external parties are included in the following categories:

Italy:

- m. Persons/entities providing compliance support services on a continuous basis;
- n. Persons/entities providing IT, ICT, Cloud, Web and Digital Marketing services;
- o. Persons/entities providing digital and physical archiving services and electronic storage;
- p. Persons/entities providing mailing services and electronic mail services;
- q. Persons/entities providing market research support services;
- r. Companies or professional consultants providing other services;
- s. Persons/entities providing ICT services (Hosting/Data Center);
- t. Agents and other commercial parties authorized to distribute our products and services on the basis of their territorial competence corresponding to the same area to which the customer or the prospective customer belongs;
- u. Lincotek Trento S.p.A.: Web and Digital Marketing services.

European Union:

- v. Agents or other commercial parties authorized to distribute our products on the basis of their territorial competence corresponding to the same area to which the customer or the prospective customer belongs;
- w. Entities providing IT, ICT, Cloud, Web and Digital Marketing services;



OBLIGATION TO PROVIDE PERSONAL DATA

Provision of personal data is not mandatory but rather optional.



PARTIES AUTHORIZED TO PROCESS THE PERSONAL DATA

Personal data may be processed by employees and collaborators in their functions, including the recipients of the communications, responsible for the fulfilment of the abovementioned purposes, that have been expressly authorised to process the personal data after having been informed and appropriately trained and after having received adequate operative instructions (internal stakeholders).



TRANSFER OF PERSONAL DATA TO NON-EU COUNTRIES

The personal data of Data subjects, located in EU Countries or Countries in the EMU, may be transferred to countries outside the EEA, in particular to:

- Switzerland: Level of personal data protection being considered as adequate by a Decision of the European Commission (Art. 25, paragraph 6, Directive 95/46/EC and Art. 45, paragraph 3 of GDPR);

USA, China and Singapore: the personal data of Data subjects who are outside the EU/EEA shall be transferred to other parties on the basis of their territorial competence corresponding to the same area to which the Data Subject belongs;

For this reason, pursuant to Art. 3, paragraph 2 of GDPR, the European Regulation is not applicable and the personal data protection law in force in the States where the Data Recipients reside shall therefore apply.

A copy of your personal data may be obtained by following the instructions provided in the following section “[Rights of the Data subject – Lodge a complaint with a Supervisory Authority](#)”.



RIGHTS OF THE DATA SUBJECT - LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

By contacting the DPO under the following e-mail address privacy@lincotek.com, Data subjects have the right to obtain from the Data controller access to their personal data, blocking of personal data and subsequent data anonymization, as well as rectification of inaccurate personal data, completion of incomplete personal data, restriction of their processing in the cases provided for in art. 18 of GDPR, and finally objection to data processing in the event of Legitimate interest of the Data Controller.

The Data Controller shall provide Data subjects with all relevant information on their requests to exercise their rights (pursuant to Articles 15 to 22 of GDPR) without undue delay and, in any case, no later than one month after the receipt of such request, as provided for by art. 12 of GDPR.

Furthermore, when processing is based on consent or on the contract and occurs by means of automated data processing systems, the Data subject shall have the right to receive his/her personal data in a structured, commonly used and machine-readable format and he/she shall have the right to transmit those data to another Data controller without hindrance, where technically feasible, (Right to data portability) as well as to obtain the permanent erasure of such data (Right to erasure /”Right to be forgotten”).

Where processing is based on consent for one or more than one purposes (Art. 6, Paragraph 1, Letter A of GDPR) or for processing special category data (Art. 9, Paragraph 2, Letter A of GDPR) withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Data subjects shall have the right to lodge a complaint with a Supervisory Authority of the Member State in which they are habitually resident or work or of the place where the alleged violation took place.