

## Personal data processing information statement pursuant to Art. 13 of EU Regulation 2016/679

### Data subjects: Customers and customer company contacts

HARS S.r.l. Società Unipersonale, in its capacity as Data Controller of your personal data, pursuant to and in accordance with the European Regulation 2016/679 herein "GDPR", hereby informs you that the aforementioned regulation establishes the protection of data subjects as regards personal data processing and that said processing will be grounded in the principles of propriety, lawfulness, transparency and shall ensure the protection of your confidentiality and rights.

Your personal data will be processed in compliance with legislative provisions of the aforementioned regulation and all confidentiality obligations set forth therein.

During the indicated processing, the Controller may operate on categories of common personal data: business, commercial, financial and insurance activities, tax code and other personal identification numbers, name, address or other personal identification elements

**Purposes and legal basis of the processing:** your data will be processed for the following purposes related to the implementation of fulfilments related to legislative obligations, under article 6, first comma, subsection c), of the GDPR:

- obligations under applicable laws;
- compulsory legal fulfilments in fiscal and accounting sector.

Your data will also be used for the following purposes relating to the execution of measures connected with contractual or pre-contractual obligations, under article 6, first comma, subsection b), of the GDPR:

- customer care relating to the management of sales operations;
- relationship management during sales operations;
- management of the sales agreement and related tasks, including pre-contractual activities and shipping;
- customers' management;

Your data will also be used for the following purposes necessary for the pursuit of the legitimate interest of the Controller, under article 6, first comma, subsection f), of the GDPR:

- handling of any returns/claims or after-sales service activities;
- email marketing purposes relating to services or products similar to those already purchased by the customer, including through the dispatch of newsletters or invitations to events concerning the said services or products; the legal basis for the data processing is the pursuance of a legitimate interest of the Data Controller, under article 6, first comma, subsection f) of the GDPR, as specifically recognised by art. 130, comma 4, of Italian Legislative Decree 196/2003 (Data Protection Code). If you are an employee/contact of the legal person customer, the legitimate interest of the Data Controller, under article 6, first comma, subsection f) of the GDPR, derives from the need to run the marketing project in relation to the legal person customer through you; you may request further information regarding this from the Data Controller, also in order to view the relevant balancing opinion specifically issued by the Data Controller. Moreover, you may object to the processing of data for this purpose at the time of collection of the data or on dispatch of every successive communication, by clicking the link provided using the link at the bottom of the communication received, or by sending a request to the Controller at the addresses indicated in this notice.

Your data may also, subject to your consent, under article 6, first comma, subsection a), of the GDPR, be used for the following purposes:

- sending advertising material, surveys and market research, also for the purpose of detecting the degree of customer satisfaction on the quality of services rendered and the activity carried out, carried out directly or through specialised companies (by means of interviews, including by telephone, questionnaires, etc.), promotion and direct sale of products and services of Group companies through traditional contact methods

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#### SYS-DAT S.p.A.

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Capitale Sociale: € 1.564.244,00 i.v.

P. IVA - Codice Fiscale: 03699600155 • REA: MI-963005

(such as paper mail and telephone calls with an operator) or by automated contact methods (such as SMS, MMS, fax, automated telephone calls electronic mail, messages through computer channels, networks and web applications);

The provision of data is optional for you with regard to the above-mentioned purposes, and your refusal to provide such data does not jeopardise the continuation of the relationship or the adequacy of the processing itself.

With regard to the above-mentioned purposes, if you are an employee/contact person of the customer/legal entity, your data will be processed by the need to interact, through you, with the customer/legal entity.

**Processing method.** Your personal data can be processed as follows:

- data entry into the company CRM;
- automated calling methods;
- In order to compare and possibly improve the results of communications, the Controller uses systems for sending newsletters and promotional communications with reports. Thanks to the reports, the Owner will be able to know, for example: the number of readers, openings, unique 'clickers' and clicks; the detail of the emails sent by date/hour/minute; the detail of the emails delivered and not delivered; the list of unsubscribers to the newsletter;
- processed by electronic computers;
- automated calling tools (e.mail-sms-mms-etc.);
- manually processed in paper files..

Each processing is carried out in compliance with the methods specified in Articles 6, 32 of the GDPR and by adopting the appropriate security measures.

Your data will be processed exclusively by staff explicitly authorised by the Controller and specifically, by the following categories of operators:

- Accounting department;
- Commercial/marketing department;

Your personal data may be processed by third parties belonging, by way of example, to the following categories:

- banks and credit institutions;
- consultants and professionals, even associates;
- within the scope of public and/or private entities to which data disclosure is compulsory for the fulfilment of legal requirements, or functional for relations administration;
- group companies as per intra-group agreements;
- external companies providing hardware, software, cloud services
- external companies providing electronic invoicing services;
- forwarders, transporters, carriers, post services, logistics companies.

The entities in the aforesaid categories operate in some cases as data processors specifically designated by the Data Controller in accordance with article 28 of the GDPR, and in other cases with complete independence as separate Data Controllers, in which case your personal data will be disclosed to the said independent data controllers on the basis of the Data Controller's legitimate interest deriving from the constraints imposed by the organisational model adopted and, in all cases, only for the pursuance of the purposes referred to in this statement

The list of such entities is available upon request to the addresses indicated in this notice.

**Disclosure:** Your personal data shall not be disclosed anyhow.

**Profiling:** your data are not subject to profiling and solely automated decision-making processes.

**Transfer of personal data:** Your personal data may also be transferred, limited to the above mentioned purposes, to countries of the EU.

**Period of data retention.** Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 of the GDPR, the period of retention of your personal data is:

- established for a period of time not exceeding the achievement of the purposes for which data is collected and processed for the performance and fulfilment of contractual purposes;
- established for a period of time not exceeding the achievement of the purposes for which data is collected and processed and in compliance with the mandatory time limits prescribed by law;
- for marketing activities, established for a period of time not exceeding the fulfilment of the purposes for which they are collected and until the data subject objects.

**Data Controller:** the Data Controller, in accordance with the Law, is HARS S.r.l. Società Unipersonale (Viale Virgilio 54/G , 41123 Modena (MO), P. IVA 01846470365, e-mail [info.cast@sys-datgroup.com](mailto:info.cast@sys-datgroup.com), Phone 059 885711) in the person of its legal representative pro tempore.

The Data Controller has appointed a Data Protection Officer (“DPO”) you can contact writing to [dpo.cast@sys-datgroup.com](mailto:dpo.cast@sys-datgroup.com)

You have the right to obtain erasure (right to be forgotten), limitation, updating, amendment, portability from the controller, as well as the right to oppose the processing of your personal data and in general, you can also exercise all rights specified in articles 15, 16, 17, 18, 19, 20, 21, 22 of the GDPR. You may also lodge a complaint with the competent supervisory authority if you consider that the processing of your data is contrary to the legislation in force.

#### **Extract EU Reg. 2016/ 679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the data subject**

1. The data subject is entitled to obtain confirmation as to the existence or otherwise of personal data concerning them, even if said data has not yet been recorded, the disclosure of said data in intelligible form, and to lodge a complaint with the Supervisory Authority.
2. The data subject has the right to receive the following information:
  - a) the origin of personal data;
  - b) the purposes and processing methods;
  - c) the logic applied in case of processing carried out by electronic instruments;
  - d) the identification details of the data controller, of the processors and of the appointed representative according to art. 5, para. 2;
  - e) the subjects or subject categories to whom the personal data can be disclosed or come into the knowledge thereof, in their capacity as appointed representative in the State, data supervisors or processors.
3. The data subject is entitled to obtain:
  - a) the updating, correction or, if he/she is interested in this, the integration of the data;
  - b) the erasure and transformation into anonymous form of any unlawfully processed data or data blocks, including those whose retention is not required in relation to purposes for which data were collected or successively processed;
  - c) certification that operations specified in letters a) and b) have been disclosed, together with their content, to the people to which data has been disclosed or provided, unless this proves impossible or requires the use of means clearly disproportionate to the right being protected;
  - d) data portability.
4. The data subject is entitled to raise a total or partial objection:
  - a) for legitimate reasons, to the processing of personal data concerning them, even if pertaining to the purpose of collection;
  - b) to the processing of his/her own personal data for the sending of advertising materials, for direct sale, or for carrying out market surveys or commercial reporting.

Updated 10.02.2025

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Date \_\_\_\_\_ Place \_\_\_\_\_

Name, Surname: \_\_\_\_\_

**Do you agree to the processing of my personal data for the optional purposes listed below?**

(YES ) (NO) sending advertising material, surveys and market research, also for the purpose of detecting the degree of customer satisfaction on the quality of services rendered and the activity carried out, carried out directly or through specialised companies (by means of interviews, including by telephone, questionnaires, etc.), promotion and direct sale of products and services of Group companies through traditional contact methods (such as paper mail and telephone calls with an operator) or by automated contact methods (such as SMS, MMS, fax, automated telephone calls electronic mail, messages through computer channels, networks and web applications).

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Mr/Ms

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