Information pursuant to Art. 13 of the Regulation (EU) 2016/679 on the protection of Personal Data (GDPR)

Ipam S.r.l. (hereinafter "**Ipam**" or the "**Company**"), is informing you pursuant to Art. 13 of the GDPR that personal data you have provided through the website <u>www.ipam-ingredienti.</u>it (hereinafter the "**Website**") can be processed according to the rules set forth by the existing laws.

1. Data Controller.

The Data Controller, that is who takes the relevant decisions on the data processing purposes, is Ipam S.r.I, VAT: 00764570347, Via Cairoli 23, 43121 Parma, ITALY.

2. Purposes of the processing for which the personal data are intended and related legal basis

The processing of your personal data will be based on principles of correctness, lawfulness, transparency and protection of your privacy and your rights, in accordance with the principles expressed by the GDPR.

Your personal data will be processed for institutional purposes, connected and/or instrumental to the service requested by you and in particular:

- a) performance of contractual obligations or services requested by you included the eventual registration on our Website or performance of one or more operation requested by you;
- b) compliance with legal **obligations and/or regulations** provided for by law (i.e. invoicing, accounts keeping, etc.);
- c) carry out the internal operational and management needs of the Companies and related to the services and / or products offered to you.

With your consent (Art. 7, GDPR), which can be subsequently revoked at any time, for the following purposes:

- d) marketing and market research including sending out (via e-mail, mail, telephone, fax and/or text and push messages) of newsletters and commercial communications relative to products marketed by the Company and/or the Ipam companies (and their commercial partners), events organized by the Company and/or the Ipam companies, open house and invitation to trade shows of your interest;
- e) Profiling: collection of information about behavior and commercial preferences related to your company field in order to improve services provided to our customers, and more specifically in order to analyze information relative to your choices preferences by the Company and/or Ipam companies, interests and habits acquired by you in the context of the offered services.

Your personal data will be treated, therefore, only for the purposes listed above. The data will be processed using appropriate tools in order to guarantee security and confidentiality and can be carried out by hard copy and/or automated tools to store, manage and transmit the data.

The processing of your Personal Data is carried out by means of the operations indicated in Art. 4, no.

2), GDPR and more precisely: collection, registration, organization, structuring, updating, preservation, adaptation or modification, extraction and analysis, consultation, use, communication by transmission, comparison, interconnection, limitation, cancellation or destruction.

The Company guarantees the logical and physical security of the data and, in general, the confidentiality of the processed personal data, putting in place all the necessary technical and organizational measures to prevent the loss of personal data, illicit use or, in any case, incorrect of the same, as well as unauthorized access by third parties.

3. Categories of Personal Data

Depending on the service requested by you at the moment of the access to the Site, the Company may process different type of Personal Data:

- a. Web navigation data: the computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the navigation of the websites. This information is not collected to be associated with identified interested parties; however, by their own nature they could, through processing and association with data held by third parties, allow users to be identified. These include the IP addresses or domain names of the computers used by users connecting to the site, the URL addresses of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server and other parameters related to the operating system and to the platform used by the user. The above data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning; they are deleted after processing. The data could be used to ascertain responsibility in case of hypothetical cybercrimes on the site: except for this eventuality, at present the data on web contacts do not persist for more than seven days. Regarding cookies, please refer to the cookie policy.
- **b. Personal Data supplied on voluntary-basis:** as identification and contact data communicated directly by you through the Company website or an e-mail or through another electronic or non-electronic communication tool, including, by way of example:
 - personal data (by way of example: your name and family name, tax code, VAT number, residence, email, certified email address, employers company, business role and/or position etc.).
- **c.** Cookie: Please refer to to the cookie policy, available in the footer of each page.

Data updating

At any time you can verify that your Personal Data processed for the purposes set forth in the present notice are correct and, if violated, you can ask their update at the following address: pr@ipam-ingredienti.it.

4. Nature of provision of personal data and consequences of the eventual refusal

For the purposes under letters a), b) and c) of Art. 2 set above, the collection of your personal data is necessary in order to access the services available on our web site (e.g. the downloading of technical documentations and/or brochures).

For the purposes under Art. 2 letters d) and e) above, the collection of your personal data is made on voluntary basis; consequently, you may decide not to provide us with any express consent, or to waive it in any moment. The lack of any express consent to process such data may cause the

impossibility for the Company and/or the IMA Group companies to perform the above-mentioned activities.

Therefore, the lack of express consent under Art. 2, letter d), will cause the impossibility for the Company and/or the Ipam companies to perform marketing and commercial activities.

5. Storage of data.

Your personal data will be stored for the period of time strictly necessary for the purposes of the data processing as indicated in Art. 2 above.

We will retain your personal data only for the necessary period in order to provide your required services, unless the Company does not need to store your data for longer periods as a result of laws, regulations or, if necessary, in order to resolve any kind of litigations or judicial investigations.

If you are interested in receiving further information on the retention periods of your personal data, we invite you to contact us using the methods indicated in the art. 8 set below of this notice.

6. Categories of personal data recipients

Your personal data cannot be transferred to third parties. For the purposes mentioned under Art. 2 above, they could be transferred to:

employees and collaborators of the Company and/or Ipam companies, who will act in their
capacity as authorized data processing personnel ("Data Processor/s") and/or to consultants
appointed by the Data Controller who need to process Personal Data for the performance of
their duties;

- third parties who carry out outsourced activities on behalf of the Data Controller providing specific services as Data Processors pursuant to Art. 28 GDPR. For information on the names and relative references of the Processors, you can contact the Company at the following address: pr@ipam-ingredienti.it or by mail at the Company headquarter;
- to judicial or supervisory authorities, public administrations, public (national and foreign)
 bodies, in compliance with the provisions of the law and conforming with a previous formal request from such subjects.

7. Transfer of Personal Data to third countries

The business structure of the Company implies, necessarily, a cross-border circulation of data that under the law is seen as transfer of data abroad, even outside the territory of the European Union. Your data, if transferred to countries outside the European Union, will always be processed in accordance with the principles set out in Art. 45 and 46 of the GDPR regarding the existence of an adequacy decision by the European Commission.

8. Exercisable Rights

With reference to your Personal Data you can exercise, at any time, the rights pursuant the GDPR as indicated below:

- Right of Access to Personal Data Art. 15 Obtain confirmation whether your data are processed or not and, in such a case, obtain information related, in particular, to: the purposes of such processing, the categories of the processed Personal Data, the storage period, the recipients to whom such data can be transferred, the right to send a complaint to the supervisory authority, the right to request the correction or cancellation or limitation of the processing or to file an opposition to the processing itself as well as the existence of an automated decision-making process.
- Right of Rectification Art. 16

 Obtain, without undue delay, the rectification of inaccurate
 Personal Data and to have incomplete Personal Data duly completed.
- Right of Erasure Art. 17 Obtain, without undue delay, the erasure of your Personal Data, in the cases provided for by the GPDR.
- Right to Restriction Art. 18 "limitation" means the marking of the data stored with the aim
 of limiting the processing in the future. This will imply the burden on the part of the Company
 and Ipam companies to suspend the processing of your Personal Data.
- Right to Data Portability Art. 20 in case of automated processing carried out on the basis
 of consent or in execution of a contract, to receive your data in a structured format, commonly
 used and readable by automatic device.

- Right to object Art. 21

 Object to the processing of your personal data, unless there are
 reasons of legitimate interest for the Data Controller to continue processing such data. You
 also have the right to object to processing where your personal information are used for direct
 marketing purposes.
- Oppose the automated decision-making process, including profiling Art. 22 your
 Personal Data must not be subject to any automatic decision-making process by the
 Company through the use of personal information or through the Customer profiling, unless
 you have expressed your consent.
- Withdrawal of consent in the event that you have given consent to the collection,
 processing and transfer of your Personal Data, you have the right to revoke it for such specific
 processing at any time. Once we receive the notice of withdrawal of consent, we will no
 longer process your Personal Data, unless these are not based upon other legitimate
 interest-basis.

You may exercise your above listed rights by means of a request to be sent by e-mail to pr@ipam-ingredienti.it or by mail to the Company headquarter.

 File a complaint pursuant to Art. 77 to the competent supervisory authority based on your residence, workplace or place of violation of your rights; for Italy, is competent the Federal Data Protection and information Commissioner

Requests relating to the exercise of your rights will be processed without undue delay and, in any case, within 30 (thirty) days of receipt of the request.

Finally, the Company reserves the right to modify or update this information also in order to comply with new obligations imposed by laws or for technical reasons.