PRIVACY POLICY Art. 13 Regulation (EU) 2016/679
CLIENTS

ZAPI s.p.a., as data controller, inform the Clients that personal data shall be processed according to Regulation EU 2016/679 "General Data Protection Regulation" (hereinafter "GDPR").

1.Data Controller

1.1 The data controller is ZAPI s.p.a., represented by its legal representative *pro tempore*, with registered office in Via Terza Strada nr. 12 – ZI, 35026 Conselve (PD), VAT number 01143740288, Tel. +39 049 9597700 e-mail info@zapispa.com - PEC zapi@pec.it (hereinafter also "ZAPI" or the "Controller).

2. Categories of personal data, purposes and legal basis for the processing

2.1 Personal data (e.g. name and last name, company name, C.F./Vat numbers, addresses, contact data) shall be processed by ZAPI exclusively for the following purposes:

a) performance of pre-contractual negotiations and fulfilment of all activities connected with the management and fulfillment of the contractual relationship (e.g. fulfillment of the contract, administrative and accounting management, shipping and invoicing). The legal basis of the processing is the performance of a contract to which the data subject is party or the steps made at the request of the data subject prior to entering into a contract (art. 6, par. 1, letter b) of the GDPR);

b) fulfillment of fiscal and regulatory obligations of the Controller (art. 6, par. 1 letter c) of the GDPR);

c) protection of ZAPI rights arising from the contract. The legal basis of the processing is the pursuit of the legitimate interests of the Controller (art. 6, par. 1, letter f) of the GDPR);

d) soft spam: for those who are already Zapi Clients, ZAPI shall use the e-mail address provided by the data subject when purchasing a service, performance or product in order to propose services, performance or products similar to those purchased, provided that the data subject did not initially refuse such use. Should the data subject no longer wish to receive the above-mentioned communications, he or she may object at any time by writing to the following address **gdprprivacy@zapi.it** or by clicking on the link in each communication. The legal basis of the processing is the legitimate interests pursued by the Controller (art. 6, par. 1, letter f) of the GDPR);

e) transmission and processing within the group of which ZAPI is a member if it is necessary for internal administrative purposes, for the management of integrated group processes, and for purposes related to management and coordination action (e.g. strategic planning, corporate governance, etc.): legitimate interests pursued by ZAPI or by the parent company Fumakilla Co. Ltd. o by other group company, properly evaluated and balanced (art. 6, par. 1, letter f) of the GDPR).

3. Modalities of personal data processing

3.1 The processing operations shall be carried out using computer and telematic tools as well as paper, in accordance with the principles of lawfulness, fairness, transparency, relevance, accuracy, with logical organization and processing related to the purposes pursued. Personal data shall be protected against destruction, alteration, deletion and unauthorized access by means of appropriate physical, logical and organizational security measures. Personal data shall be processed, for the purposes referred to in paragraph 2, by persons working within the internal organizational structure of the Controller, specially authorized and trained according to their duties, and by external persons appointed as data processors pursuant to article 28 of the GDPR.

3.2 There are no automated decision-making nor profiling processes.

4. Nature of the provision of data and consequences of failure to provide data

4.1 The provision of personal data is necessary for pre-contractual negotiations, to enter into the contract, to fulfill the contract and to comply with legal obligations. Any refusal to provide data, in whole or in part, may make it impossible to pursue the above purposes.

4.2 Concerning soft spam, refusal to use e-mail coordinates for this purpose prevents the sending of commercial communications only and has no implication on the execution of contracts.

5. Personal data retention period

5.1 Personal data relating to the contract shall be stored for the entire duration of the contractual relationship and, subsequently, for the duration foreseen by the applicable civil and fiscal regulations, and in any case no later than 10 years from the end of the contractual relationship. Further periods of storage are allowed, also related to the protection of the rights of the Controller, where required by law; subsequently, the data shall be deleted or made anonymous.

5.2 The e-mail address for the purpose of soft spam communications will be retained until the Data Subject objects.

6. Recipients of the personal data

6.1 Personal data may be disclosed, for the purposes referred to in paragraph 2, to the persons authorized to process operating within the internal organizational structure of the Controller who are committed to confidentiality or have an adequate legal obligation of confidentiality.

6.2 Personal data may be disclosed to all those public and private subjects whose disclosure is necessary to pursue the purposes referred to in paragraph 2 (e.g. ZAPI's legal and tax consultants, trusted external companies for the provision of services, including computer services, shipping and insurance company, debt collection agencies, Financial Administration, parent company, group companies) or is required by law or regulation, as well as in the event of requests from the Public Authorities. These subjects will operate as data controllers, by force of appropriate appointment, or autonomous data controllers, depending on the purpose and type of processing carried out.

6.3 Where necessary in relation to the organizational needs of ZAPI, the parent company and the group, personal data may be transferred to third countries outside the EU in the presence of adequacy decisions under Article 45 GDPR or adequate safeguards under Articles 46-47 GDPR. Personal data shall not be transferred to international organizations.

7. Data subject rights

7.1 In accordance with article 15-21 of the GDPR, the data subject has the right to:

- obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the information of article 15 of the GDPR (right of access);
- obtain from the Controller without undue delay the rectification of inaccurate personal data concerning him or her or the completion of incomplete personal data (right to rectification – art. 16 of the GDPR);
- obtain from the Controller the erasure of personal data concerning him or her without undue delay, if applicable (right to erasure - art. 17 of the GDPR);
- obtain from the controller restriction of processing (right to restriction of processing - art. 18 of the GDPR);
- object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her and object to the processing of personal data for direct marketing purposes (right to object - art. 21 of the GDPR).

7.2 The rights shall be exercised by contacting the data controller at:

ZAPI s.p.a. - Via Terza Strada, 12 - 35026 Conselve (PD)

gdprprivacy@zapi.it – PEC zapi@pec.it

The data subject may communicate at any time that he/she does not wish to receive soft spam communications by sending a request to **gdprprivacy@zapi.it** or by clicking on the link present in each communication.

The data subject has also the right to lodge a complaint with the Italian Data Protection Authority pursuant to article 77 of the GDPR.

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