



INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR CLIENTS

Pursuant to Articles 13 and 14 of the EU regulation 2016/679

Dear customer,

in order to implement the contractual or pre-contractual measures requested by you, or to process some personal data that you have given us for marketing and commercial purposes, or enforce a legal obligation, we will process your data according to Articles 13 and 14 of the EU Regulation 2016/679.

Therefore we wanted to provide you with the information concerning the processing of your Personal Data that we will put in place.

Identity and contact details of the Data Controller

The Data Controller is Demac Srl (the “**Company**”) (C.F. e P. Iva 0800560154), head office in Magenta (Mi), Via Murri, n. 14, 20013, in the person of the pro tempore legal representative Domenico Varano (C.F. VRNDNC47C14H456J); e-mail: info@demac.it; pec: demacsrl@cg.legalmail.it; fax: 02.97003509; tel.: 02.9784488.

Purposes of the processing

Collected personal data will be processed by the Data Controller for the performance of the related activities, for the purposes indicated below.

Commercial purposes

Personal data will be processed firstly for legal obligation enforcement purpose regarding commercial partnerships, in which your employer, or you personally, are involved, or to implement pre-contractual measures requested to the Data Controller or to enforce a legal obligation (following “Commercial purposes”).

In particular personal data for commercial purposes will be treated:

- to conclude and execute contracts concerning the products and services of the Company, including the execution of all activities related to or incidental to the execution of contracts, including but not limited to the execution of sales and after-sales services, the management of returns and warranties;
- to implement pre-contractual measures requested by you related to products or services of the Data Controller;
- to fulfill every request related to products or services bought by the data controller;
- for the cash receipts and payments management;
- to fulfill administrative, accounting and fiscal activities.

Marketing purposes

Personal data collected with every type of commercial contract stipulated with the Data Controller could be processed, with your consent, for marketing purposes too (following “Marketing purposes”) for the following purposes:

- to send via email, mailbox, SMS, fax, advertising material, messages with commercial, marketing, promotional or advertising purposes related to products or services of the data controller;
- for direct sales activities or placement of products and services of the data controller;
- to send via email, mailbox, SMS, fax, telephone contacts, newsletter and invitations to events, meetings, exhibitions organized by the data controller or in which the data controller takes part;
- to carry out sample-based marketing research.

You will be free to give your consent to the personal data processing for marketing purposes without negative consequences for you caused by your refuse or withdraw of your original consent, except for the impossibility to receive commercial information.

In any case, you will be able to express your will to receive communication for marketing purposes exclusively through way indicated above (via email, SMS, telephone contact) by sending an email to privacy@demac.it or a registered mail to the address of the data controller head office.

We inform you that, following your purchase, we could send you commercial communications regarding services or products of the data controller similar to the one you have purchased. You can revoke your consent to this processing at any moment.



Personal Data Recipients

Your Personal Data might be communicated, for the purposes above, to the following categories of subjects:

- to public subjects or to subjects that provide public services, that can access to personal data according to GDPR (for instance: judicial authority, financial administration offices, law enforcement agency, or subjects with public powers);
- other subjects to which is necessary to communicate information regarding the implementation of the contract in which the data controller takes part, such as credit institutions, shippers or transporters and every other third subject involved in the implementation of the contracts in which the person concerned or the institution in which the person concerned works takes part;
- agents, distributors of the Data Controller or third-party professionals that cooperate with the Data Controller;
- other companies that are part of the same group of the Company;
- advertising agencies;
- employees or collaborators of the Data Controller appointed as data processors;
- external subjects that carry out consultancy activities in the administrative, accounting, fiscal or commercial legal field or in any case are related to the activity of the Data Controller, website provider, cloud provider, within the limits necessary to carry out their professional duties, according to the previous agreement that imposes on them the duty of confidentiality and security of the processing of Personal Data;
- sales agents.

Personal Data given for both Commercial and Marketing purposes will not be diffused.

Legal basis for the processing

Legal basis of the Personal Data processing for commercial purposes and legitimate interests pursued:

Personal data for commercial purposes will be processed legitimately, without your expressed consent, in accordance with Article 6 b) and f) of the GDPR.

Legal basis of the use of personal data for the fulfillment of legal obligations:

Your Personal Data will be processed legitimately on the legal basis of the fulfillment of a legal obligation according to Article 6 c) of the GDPR, if the Data Controller is required to fulfill those obligations by virtue of the relationship between you and the Data Controller.

Legal basis of the processing of Personal Data for Marketing purposes and legitimate interests pursued:

Your Personal Data will be processed for Marketing purposes according to Article 6 a) of the GDPR. They will be processed on the basis of your consent until this consent is revoked or you oppose to this processing.

The Data Controller will carry out direct marketing activities, with the aim of sending you commercial communications in the absence of your consent, by virtue of his own interest according to Article 6 f) of the GDPR, only in regards of services and products of the Data Controller similar to those previously bought by you or your employer, in a manner that does not undermine your rights and basic freedoms.

Methods of processing

The processing of Personal Data will consist in collecting, recording, organizing, structuring, storing, adapting or modifying, extracting, consulting, using, communicating, limiting, cancelling, destructing.

Personal Data will be subjected to both paper-based processing and processing realized with the help of computerized and automated tools, through the use of hardware and software owned by the Data Controller or third parties.

Period of Personal Data retention

- Personal Data collected for commercial purposes will be processed and stored for the entire duration of the contract that exists between you and the Data Controller, or between the Data Controller and your employer.
- Personal Data will be stored for a period following the end of the contract above mentioned, for purposes of defense in court of the Data Controller, until the expiration of the limitation period for actions in contractual and non-contractual matters, during which the storage of information that includes your Personal Data is necessary in order to be able to prove the exact fulfillment of the contracts of which the Data Controller is part by the latter.



- Personal Data collected for Marketing purposes will be processed and stored for 24 months, unless your consent to the processing for Marketing purposes is renewed.
- Personal Data collected for Marketing purpose through profiling activities will be processed and stored for 12 months, unless your consent to the processing or Marketing purposes through profiling is renewed.

Nature of the provision of Personal Data

The provision of Personal Data for commercial purposes is optional, however, the failure to provide Personal Data might make it impossible to conclude or execute the contract or the commercial relationship.

The provision of Personal Data for Marketing purposes is always optional, even if Personal Data have been provided for commercial purposes. The failure to provide Personal Data will have as only consequence the impossibility to be informed on commercial initiatives of the Data Controller unless you previously make a specific request. You will be able to deny your consent to the processing of Personal Data for Marketing purposes at any moment by sending an email to the address privacy@demac.it.

Data subject's rights

The Data Subject is able to exercise his rights according to Chapter III, Section I, of the GDPR.

Exercise of Data subject's rights

You will be able to exercise your rights through an email request to the address privacy@demac.it. The exercise of the rights is not subjected to formal constraints, it is free and it will have effect against the Data Controller.

Further information

Further information regarding the processing and the communication of Personal Data, directly provided or acquired in other ways, may be asked to the Administrative Office. This information does not exclude that other information will be given, even orally, to the Data Subject at the time of the collection of Personal Data.

The updated list of Processing Processors is available at the Human Resources function and will be provided upon request of the Data Subject.

Magenta, 15/04/2025