



CLIENT - SUPPLIER DATA PROTECTION POLICY

ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

Dear Mr/Mrs,

EU Regulation no. 679 of 27 April 2016 (hereinafter “the Regulation”) provides for the protection of natural persons in terms of the processing of personal data.

We therefore submit for your attention the following policy.

C.O.I.M. S.p.A. – CHIMICA ORGANICA INDUSTRIALE MILANESE - (hereinafter also referred to as the “**Company**”), pays the utmost attention to the security and confidentiality of the personal data of its clients/suppliers (hereinafter also referred to as “data subjects”) in the running of its business. This data will therefore be processed lawfully and fairly, in conformity with the provisions of the Regulation.

In accordance with article 13 of the Regulation the Company is required to provide you with certain information regarding the processing your personal data (hereinafter also referred to as “Data”), as a result of your relationship with the Company.

IDENTIFICATION DETAILS OF THE DATA CONTROLLER

The Controller of your personal data is the company C.O.I.M. S.p.A. - CHIMICA ORGANICA INDUSTRIALE MILANESE, with registered offices in Buccinasco (MI), via Delle Azalee no. 19, and sub-offices/production sites in Offanengo (CR), via Ricengo no. 21/23, and in San Martino in Strada (LO), via privata Fabrizio De Andrè no. 24, VAT Code. 00798810156.

IDENTIFICATION PARTICULARS OF THE DATA PROTECTOR OFFICER (DPO)

The Data Protector Officer (DPO) appointed by C.O.I.M. s.p.a. is Nicola Bernardi, who can be reached at the email address: dpo_coim_it@coimgroup.com.

PERSONAL DATA CONCERNING YOU THAT MAY BE COLLECTED

The following categories of data concerning you may be received or collected:

- **Personal and contact data**
- **Interests** – information you provide us with regarding your interests, including products you are interested in.
- **Other personal data** – for example information that you provide us with regarding your professional situation.
- **Use of the website** – information relating to the ways you use the website, open or forward our communications, including information collected through cookies.
- **Payment data**

We kindly ask you to promptly report any changes to your personal details to the relevant company office in order to comply with art. 5 of Reg. EU 2016/679, which requires data that are collected to be accurate and, as such, up to date.

PURPOSES YOUR PERSONAL DATA CAN BE USED FOR

The processing of personal data must be justified by one of the legal grounds set forth by the applicable regulation on the protection of personal data as described below.



a) Establishing and performing contractual relations and resulting obligations, including communication relating to services (for example to allow for post-sales services)

The Company may process your contact Data in order to establish and perform any contractual relations, supply any services that are requested and respond to reports and complaints.

The Company may also use your contact Data, and in particular your email address, to provide you with information relating to the service.

Grounds for processing: fulfilment of contractual obligations.

The provision of Data is obligatory for managing the contractual relationship and a failure to do so will result in us being unable to manage the relationship.

b) Operational management and strictly connected purposes for access to - and use of - the website.

The Company collects your contact Data and Use data of the website to enable you: to access personalised services of the website, contact the Company and to provide you with assistance.

Grounds for processing: fulfilment of contractual obligations.

The provision of data is obligatory to respond to your requests and a failure to do so will result in us not being able to do so.

c) Conformity to legally binding requests to comply with legal/regulatory obligations or provisions from judicial authorities, and to defend a right in a judicial capacity.

The Company collects your contact Data to fulfil a legal obligation and/or to defend a legal right in a judicial capacity.

Grounds for processing: legal obligations, which the Company is required to comply with.

HOW WE KEEP YOUR PERSONAL DATA SECURE

The processing of your Data shall be based on principles of fairness, lawfulness and transparency and shall take place through electronic and manual means and instruments provided to parties acting under the Controller's authority and through procedures that are suitable for ensuring the security and confidentiality of the Data and avoiding the risk of loss, unauthorised access, unlawful use and dissemination. The paper files and especially the electronic files where your Data are stored and retained are protected using security measures that are effective and suitable for contrasting the risks of breaches considered by the Controller. With particular regard to electronic and telecommunication instruments, the Controller periodically and constantly verifies the measures it adopts to guarantee the confidentiality of personal data that is processed, filed and retained through said instruments, especially when this concerns special categories of data.

HOW LONG WE RETAIN YOUR INFORMATION FOR

Personal data are kept for the period of time that is necessary for completing the activities associated with the management of the contract with the Controller and for the fulfilment of the resulting obligations, including legal obligations.

In particular, there follows details of the retention times for the different purposes listed above:

a) Fulfilment of contractual obligations: data that are processed to fulfil any contractual obligation may be retained for the entire duration of a contract and in any case for no longer than 10 years after its expiry, in order to verify any pending issues, including accounting documents (e.g. invoices).

b) Operational management and strictly connected purposes for access to the website: data that are processed for this purpose may be retained for the entire duration of the contract and in any case for no



more than 10 years from its expiry.

c) In the event of disputes: where we need to defend ourselves or act or even present claims against you or third parties, we may retain personal data we believe is reasonably necessary to process for said purposes for the period of time in which such claims can be pursued.

Computer files are located within the borders of the EU (and EEA) and are not connected nor do they interact with databases located beyond said borders.

Access to your Data is limited by us to parties who need to use these for the purposes specified above.

WHO WE SHARE YOUR PERSONAL DATA WITH

Your personal data may be accessed by duly authorised employees, as well as external suppliers providing support in the supply of services, who will be appointed as data processors if necessary.

Your Data are not disseminated to unspecified parties and will only be subject to internal communications within the Company and potentially to other companies of the COIM group with registered offices in other European and non-European countries for the fulfilment of contractual obligations. In any case, the transfer of Data shall take place in accordance with the technical and organisational measures adopted by the COIM group to ensure a suitable level of security in the transfer of the personal data of Data Subjects.

CONTACTS

To exercise your rights and for any report concerning the processing of your Data you can send an email to one of the following addresses: privacy@coimgroup.com and dpo_coim_it@coimgroup.com.

YOUR RIGHTS IN TERMS OF DATA PROTECTION AND YOUR RIGHT TO SEND COMPLAINTS TO THE SUPERVISORY AUTHORITY

Under certain conditions you have the right to request:

- access to your personal data,
- a copy of the personal data you have provided to us (so-called portability),
- the rectification of the data in our possession,
- the erasure of any data we no longer have any legal grounds to process,
- your objection to processing where this is provided for by the applicable regulation,
- the revocation of your consent, where processing is based on consent;
- the restriction of the way we process your personal data, up to the limits set forth by the regulation for the protection of personal data.

The exercising of the above rights is subject to certain exceptions for the purpose of safeguarding the public interest (for example the prevention or identification of crimes) and our interests (for example maintaining professional secrecy). Should you exercise any of the above-mentioned rights, we shall be responsible for verifying whether you are entitled to exercise these and will normally respond within a month, without prejudice to the possibility to extend this deadline for a further two months, if necessary, in consideration of the complexity and number of requests received by the Controller.

For any complaints or reports on the processing procedures of your Data we will do our best to address your concerns. Nevertheless, should you wish to do so, you can send your complaints or reports to the Supervisory Authority for the protection of personal data, using the contact details on the website www.garanteprivacy.it.

C.O.I.M. S.P.A.