

PRIVACY NOTICE

(Pursuant to articles 19, 20 and 21 of the Federal Act on Data Protection)

INTRODUCTION

Teoresi S.A., in accordance with the applicable legislation, undertakes to process your personal data in accordance with the principles of lawfulness, fairness, good faith transparency, pertinence and necessity established by Article 6 of the New Federal Act on Data Protection (“**FADP**”).

Teoresi S.A. invites you to read the following privacy notice drawn up pursuant to Articles 19, 20 and 21 of the FADP. This privacy notice is addressed to all customers of Teoresi S.A. (“**Data Subjects**”).

DATA CONTROLLER

The Data Controller of your data processing is Teoresi S.A., with registered office in Via Crocicchio Cortogna, 6, CP 6105 – 6901 Lugano (CH).

The contact details of the Data Controller are: Tel. +41 919104580; e-mail: privacy@teoresigroup.com.

CATEGORIES OF PROCESSED DATA AND LEGAL BASIS FOR PROCESSING

The Data Controller will process your personal data collected during the establishment and the execution of the business relationship.

The processing will concern the following Data:

- Common identification data, such as: first name, last name, tax code, residential address; place and date of birth;
- Contact data, such as: telephone number, e-mail address and/or certified email address;
- Company;
- Job title;
- Bank account details (e.g., IBAN);
- Payment details.

PURPOSE OF THE PROCESSING

The processing of such personal data will be carried out for the proper management and execution of the business contractual relationship between the Data Controller and the Data Subject, for the fulfilment of the obligations the Data Controller is subject to.

In particular, the Data you provide will be processed for the following purposes:

- management of pre-contractual, contractual and post-contractual phases (invoices and offers issuing, payments management, orders and deliver products/services processing, inquiries, complaints, or service requests management..)
- process operational, administrative, organizational, managerial, tax, financial, insurance and accounting records relating to the relationship established and comply with the regulatory obligations the Data Controller is subject to;
- send promotional communications, invitations to events, newsletters;
- management of access to company’s premises;
- management of potential arising disputes.

SECURITY MEASURES

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Data will be processed and collected through paper-based and telematic media, also by entering them into databases, archives, platforms, suitable to ensure the security, confidentiality, integrity and availability of the data. In particular, in carrying out the data processing operations, the minimum level of data protection required by law is guaranteed by adopting all the technical, computer, organizational, logistical and procedural security measures, which are designed to ensure a level of protection appropriate to the risks associated with the processing of such personal data. Your Data will be likewise processed only by personnel expressly authorized by the Data Controller.

DATA RECIPIENTS

Your Personal Data may be shared by the Company with the following subjects:

- all those subjects entitled to lawfully access to such data by virtue of legislative measure,
- our collaborators, employees in charge of data processing, as part of their duties,
- all those natural and/or legal persons, public and/or private, including the other Group companies, when the disclosure is necessary or functional to the establishment and management of the contractual and/or commercial relationship, according to the modalities and for the purposes described above (eg: sub-contractors, companies or professional firms that provide assistance and advice to the Company).

DATA RETENTION PERIOD

Please note that, in accordance with the principles as of in the introduction of this Privacy Notice, your data will be kept for the time necessary to achieve the purposes effectively pursued. In any case, the retention period of your personal data will not exceed 10 years.

DATA PROCESSOR

Your personal data may also be processed by third parties, which, by virtue of their appointments as Data Processors pursuant to art. 9 of the FADP, carry out on behalf of Teoresi further activities linked to the business contractual relationship.

DATA TRANSFER

The Data Controller may transfer personal data to data processors, other Group companies as well as to authorized third parties located in countries other than Switzerland. When doing so, it ensures that such transfers takes place in compliance with the applicable law, and in particular with art. 16 of the FADP, by ensuring that all recipients of personal data provide an adequate level of protection and process data only in accordance with applicable laws and our instructions.

According to the law, where needed, we will also inform you and seek your consent for such data transfers.

RIGHTS OF DATA SUBJECT

As a Data Subject, you may exercise the rights provided for by Art. 25-29 set forth in the FADP against Teoresi S.A., by sending a communication to privacy@teoresigroup.com. Limitations to the requests may apply in accordance to the applicable law.

Your request will be in any case processed by the Data Controller within 28 days.

CHANGES TO THIS NOTICE

We may update this Privacy Notice from time to time. The last version will always be available on our website at: <https://www.teoresigroup.com/privacy-notices/>.
