PRIVACY NOTICE PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679 (GDPR)

The Data Controller hereby informs you about the processing of the personal data necessary for the management of the requests for information and contact submitted through the "Contact us" form available on the website www.pompea.com, as well as for sending the relevant replies.

For the processing operations common to all sections of the Website – browsing data, security of the infrastructure and technical management of the platform – reference is made to the general privacy notice relating to the website; for the use of cookies and other tracking tools, reference is made to the Cookie Policy. Requests relating to orders already placed are managed in accordance with the provisions of the privacy notice dedicated to registration with the Website and to the e-commerce functionalities.

Data subjects
Users who submit a request for information or contact through the form available on the Website.

Data Controller
POMPEA S.P.A. A SOCIO UNICO – Via San Damaso, 10, 46046 Medole (MN); e-mail: info@pompea.com; VAT no. 01789800206, in the person of its legal representative pro tempore.

Data Protection Officer
Pursuant to Article 37 GDPR, the Data Controller has appointed as DPO the company Progetto Qualità e Ambiente S.r.l., in the person of Armando Iovino, who may be contacted at the e-mail address dpo@pqa.it. Protocol no. 20220004350

Purposes of the processing and legal bases
Your data will be processed for the following purposes on the basis of the corresponding legal bases:

No.	Purpose	Legal basis
1	Receipt, handling and management of the request for information or contact submitted through the form, sending of the relevant reply and management of any subsequent communications necessary to follow up on the request.	The processing is necessary in order to reply to the data subject's request and, where the request is aimed at the conclusion of a contract, in order to take steps at the data subject's request prior to entering into a contract. Article 6(1)(b) GDPR and, for requests of an informational nature, Article 6(1)(f) GDPR – legitimate interest of the Data Controller in replying to those who contact it.
2	Internal organisation of the service: forwarding of the request to the competent company function, tracking of the processing status and verification of the quality of the reply provided.	Article 6(1)(f) GDPR – legitimate interest of the Data Controller in managing the requests received in an orderly and efficient manner.
3	Compliance with legal and regulatory obligations, as well as the establishment, exercise or defence of a right in judicial and out-of-court proceedings, where the request concerns disputes, complaints or reports.	Article 6(1)(c) GDPR – Article 6(1)(f) GDPR – legitimate interest of the Data Controller in protecting its own rights (Recital 47 GDPR).

No.	Purpose	Legal basis
4	Marketing activities carried out through the sharing of contact data with digital platforms and social networks, within the framework of campaigns of the "Custom Audience CRM" type. In this way, the Data Controller's advertisements may be addressed to you in the spaces available on the pages of the digital platforms, in the event that the data subject's social profile is configured so as to be able to receive them.	The processing is carried out on the basis of the data subject's consent, given through the preference management panel relating to cookies and other tracking tools and revocable at any time. Article 6(1)(a) GDPR – Article 7 GDPR – Article 122 of Legislative Decree no. 196/2003.

Your personal data are not subject to any automated decision-making, including profiling, producing legal effects concerning you or similarly significantly affecting you within the meaning of Article 22 GDPR. The data provided through the form are not used for sending promotional communications by e-mail: the newsletter service requires a separate and optional subscription, described in the relevant specific privacy notice. The marketing activities through digital platforms referred to in purpose no. 4 remain unaffected, as described in the following paragraph and subject to the consent given for marketing and profiling cookies.

Marketing activities through digital platforms (Custom Audience)
Purpose and operating arrangements. The Data Controller may carry out promotional activities by creating, on digital platforms and social networks, audiences of recipients (so-called Custom Audiences) made up of users who have already been in contact with the Data Controller. To this end, the contact data provided in the form may be shared with such platforms so that the Data Controller's advertisements are shown to the data subject in the spaces available on the pages of those platforms. This processing corresponds to purpose no. 4 of the table above.

Role of consent to cookies and tracking tools. The sharing takes place exclusively by means of the tracking tools (pixels and tags) made available by the digital platforms and integrated into the Website, the activation of which is subject to the consent given by the user for marketing and profiling cookies through the preference management panel, pursuant to Article 122 of Legislative Decree no. 196/2003 and in accordance with the provisions of the Cookie Policy. In the absence of such consent, the tracking tools are not activated and no data is transmitted to the platforms; the failure to give consent does not in any way affect the handling of the request and the sending of the reply.

Pseudonymisation and matching verification. The contact data are transmitted to the platform in pseudonymised form, by applying a hash function which renders them unintelligible before transmission. The platform uses them for the sole purpose of verifying the match with the accounts of its registered users: in the event of a match, the data subject is included in the audience targeted by the campaign; otherwise, the data is erased without any further use.

Withdrawal of consent. Consent may be withdrawn at any time through the preference management panel, which can be accessed from the dedicated section of the Website, without affecting the lawfulness of processing carried out before such withdrawal. Withdrawal entails the cessation of the transmission of data to the platforms; in order to be removed from the audiences already created, the data subject may also exercise the rights granted by the platform or contact the Data Controller at the contact details indicated in this Privacy Notice.

The digital platforms also process the data received in their capacity as independent data controllers, in accordance with the privacy notices provided by their respective operators; where the Data Controller determines, jointly with the platform, the purposes and means of the processing, the relationship is governed pursuant to Article 26 GDPR. The processing does not

entail the adoption of automated decision-making producing legal effects or similarly significantly affecting the data subject within the meaning of Article 22 GDPR.

Categories of personal data processed
For the purposes set out above, it is necessary to process:

- Identification and contact data provided in the form: name, e-mail address and country of origin;
- The content of the message entered in the free-text field and any further personal data that the data subject decides to include therein of their own accord, as well as the content of any subsequent communications exchanged with the Data Controller.

Data subjects are invited not to enter in the free-text field data belonging to the special categories referred to in Article 9 GDPR – such as, by way of example, data capable of revealing the state of health – nor data relating to criminal convictions and offences referred to in Article 10 GDPR, as they are not necessary for the management of the request. Should such data nevertheless be provided by the data subject, the Data Controller will process them only to the extent strictly necessary to reply to the request and will erase them as soon as that necessity has ceased.

The contact form is not intended for persons under fourteen years of age: the Data Controller does not knowingly collect personal data relating to minors below that age in the absence of consent given or authorised by the holder of parental responsibility, pursuant to Article 8 GDPR and Article 2-quinquies of Legislative Decree no. 196/2003.

Nature of the provision of personal data
The provision of the data marked as mandatory in the form is necessary for purpose no. 1: failure to provide it will not allow the Data Controller to handle the request and to provide the relevant reply. The provision of any further data entered in the free-text field is left to the free choice of the data subject. The consent relating to purpose no. 4 (marketing through digital platforms) is optional and the failure to give it, as well as its subsequent withdrawal, does not in any way affect the handling of the request and the sending of the reply.

Disclosure of personal data
The personal data may be disclosed to:

- Companies providing hosting services, the technological platform of the Website and the development, support and maintenance services for the related databases;
- Providers of e-mail services and of services for the management of support requests;
- Other companies subject to the management and coordination of the Group to which the Data Controller belongs, where competent to reply to the request;
- Consultants and self-employed professionals, including in associated form, for the purposes of protecting the Data Controller’s rights;
- Judicial and public security authorities, in the cases provided for by law.
- Digital platforms and social networks, for the marketing activities described in this Privacy Notice;

The above-mentioned parties have been expressly appointed as Data Processors pursuant to Article 28 GDPR or process the data in their capacity as independent data controllers. The updated list of Data Processors may be requested by contacting the Data Controller at the contact details indicated in this Privacy Notice.

Dissemination of personal data
The personal data will not be disseminated in any way.

Transfer of data to third countries
The personal data are ordinarily processed within the European Union. Some technology service providers may be established, or may use technical and support resources, in third countries: in such cases the transfer takes place in compliance with Articles 44 et seq. GDPR, on the basis of an

adequacy decision of the European Commission – including, for entities established in the United States of America and adhering to the relevant list, the EU-U.S. Data Privacy Framework – or of standard contractual clauses, supplemented where necessary by supplementary measures identified following a transfer impact assessment. A copy of the safeguards adopted may be requested at the Data Controller's contact details indicated in this Privacy Notice. The sharing of contact data with digital platforms and social networks for the marketing activities described in this Privacy Notice may likewise entail a transfer to third countries, carried out in compliance with the same safeguards.

Data retention period
The retention of your personal data is established according to the following criteria:

Purpose	**Retention period**
Management of the contact request and sending of the reply (purposes no. 1 and no. 2)	12 months from the closure of the request, being the period within which the Data Controller retains the correspondence in order to follow up on any related requests and to demonstrate that the request has been handled.
Marketing activities through digital platforms (Custom Audience)	Until consent is withdrawn and, in any event, for the time necessary to update the audiences transmitted to the platforms. Data which do not match any account are erased by the platform without any further use.

Rights of the data subject
Pursuant to Articles 15 to 22 GDPR, the data subject may request the Data Controller to exercise the right of access, rectification, erasure ('right to be forgotten'), restriction of processing, data portability and objection to the processing. In relation to the processing operations based on the legitimate interest of the Data Controller, the data subject has the right to object at any time on grounds relating to their particular situation, pursuant to Article 21 GDPR. The consent given for the marketing activities through digital platforms may be withdrawn at any time through the cookie preference management panel, without affecting the lawfulness of processing carried out before such withdrawal.

Requests may be submitted to the Data Controller at the address info@pompea.com or to the Data Protection Officer at the address dpo@pqa.it

For further information concerning the rights of the data subject, you may consult the website www.garanteprivacy.it

Pursuant to Article 77 GDPR, the data subject may lodge a report or complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali), with registered office at Piazza Venezia, 11 – 00186 Rome, Italy, e-mail: urp@gpdp.it