



INFORMATION NOTICE
Pursuant to art. 13 Reg. 679/2016 UE
clients and suppliers
PFB S.r.l.

Dear Clients and Suppliers,

P.F.B. S.r.l. is aware of the provisions set forth by EU Regulation 679/2016 and Legislative Decree 196/2003, which protect individuals with regard to the processing of personal data. According to this legislation, such processing shall be based on principles of fairness, lawfulness, and transparency, ensuring the protection of your privacy and your rights. Pursuant to Article 13 of EU Regulation 679/2016, P.F.B. S.r.l. provides the following information:

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a) IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

PFB S.R.L.

Via Raimondo dalla Costa n. 690, Modena (MO)

Tax Code: 00158620369, REA no. MO-118019

E-mail: privacy@pfb.it

b) DATA PROTECTION OFFICER (DPO)

The Data Controller has not appointed a Data Protection Officer (DPO) pursuant to Article 37 of EU Regulation 679/2016, as, given the nature and scope of its activities, it does not perform data processing operations requiring such designation.

c) PURPOSE AND LEGAL BASIS OF PROCESSING

The processing performed by the Data Controller may be carried out through electronic and/or paper documentation and serves the following purposes:

c.1) Pursuant to Article 6(1)(b) of EU Regulation 679/2016:

to perform the obligations arising from the contractual relationship established and, for clients, as set forth in the general terms of sale published on www.pfb.it under the "Legal Notes" section.

c.2) Pursuant to Article 6(1)(c) of EU Regulation 679/2016:

to comply with administrative, accounting, tax, and legal obligations, as required by law, and to manage any administrative, accounting, and tax disputes related to the provision of services.

c.3) Pursuant to Article 6(1)(f) of EU Regulation 679/2016 and Article 130(4) of Legislative Decree 196/2003:

clients' email addresses may be used to send promotional and commercial communications related to products or services similar to those already purchased (so-called "soft spam").

The personal data provided will not be used for automated decision-making processes (profiling).

Should the data be processed for purposes other than those above (e.g. for marketing, if you subscribe to our newsletter), the Controller will provide additional information and request your explicit consent where required.

d) NATURE OF DATA PROVISION

Providing your data is mandatory for the purposes indicated in point **c)**, and failure to provide such data may make it impossible to execute the contractual relationship.

Please note that the provision of this information notice, together with the execution of the contract, constitutes your acknowledgment or lack of opposition to processing through a clear and affirmative act.

e) DATA COMMUNICATION SCOPE AND DATA PROCESSORS

Your personal data may be processed by individuals formally appointed by the Data Controller as Data Processors pursuant to Article 28 of EU Regulation 679/2016 and/or by anyone acting under its authority, duly instructed under Article 29. Data will only be processed as necessary for the stated purposes and within the scope of the assigned tasks. In particular, the following categories of third parties may have access to your data depending on the service provided:

- Companies or professionals performing specific tasks on behalf of the Controller (e.g. assistance with company management software, IT systems maintenance, or consultancy in administrative, accounting, legal, or tax matters);
- Law firms and lawyers, for the protection of contractual rights;
- Banks and, where necessary, financial institutions, leasing, or debt collection companies for managing financial transactions;
- Public authorities and institutions, where required by law.



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The data disclosures described above are, depending on the case, connected to specific legal and/or contractual obligations, or are necessary for the conclusion of the contractual relationship, or are strictly related to the normal business operations involved in managing the established contractual relationship. They are therefore strictly necessary for the purposes set out in paragraphs c.1 and c.2; consequently, failure to provide such data may result in the impossibility of establishing and/or properly performing the contractual relationship.

e.1) The Controller does not transfer clients' or suppliers' personal data outside the EU or to international organizations. If this changes, transfers will only occur under appropriate safeguards and this notice will be updated accordingly.

e.2) Personal data will not be disclosed to the public.

e.3) A complete and updated list of Data Processors is available upon request by contacting the Controller at the address listed under section a).

f) RETENTION PERIOD

Data will be retained for the time necessary to achieve the purposes indicated in point c). Specifically:

- **For point c.1:** for the entire duration of the contractual relationship and until its full execution, including any period necessary for complaints;

- **For point c.2:** for ten (10) years after the end of the relationship, unless otherwise required by law.

In case of litigation, retention will continue until its final resolution;

- **For point c.3:** until you exercise your right to object.

g) DATA SECURITY

The Controller, taking into account the state of the art, implementation costs, and the nature, scope, context, and purposes of the processing—both when determining the means of processing and at the time of the processing itself (so-called risk analysis – accountability)—has implemented appropriate technical and organizational measures designed to effectively apply data protection principles and to integrate the necessary safeguards into the processing in order to meet the requirements of EU Regulation 679/2016 and protect the rights of the data subject.

Data processing will be carried out using methods and tools suitable to ensure security (Articles 24, 25, and 32 of EU Regulation 679/2016) and will be performed both through automated processes and non-automated means (paper archives). All appropriate technical and organizational measures will be applied to ensure a level of security appropriate to the risk, thereby guaranteeing on a continuous basis the confidentiality, integrity, availability, and resilience of processing systems and services (including, but not limited to: controls over the assignment of responsibilities to data processing personnel and the classification of the data itself; procedures, where feasible, for pseudonymization and encryption; disaster recovery mechanisms, etc.).

No profiling activities are carried out.

h) DATA SUBJECT RIGHTS

The Data Controller also informs you that, as a data subject, pursuant to EU Regulation 679/2016, you may exercise the following rights regarding your personal data:

- **Access** (Art. 15 of EU Regulation 679/2016): you have the right to obtain confirmation from the Data Controller as to whether or not personal data concerning you are being processed, and, where that is the case, to access the information related to such processing (purposes, categories of data, recipients or categories of recipients to whom the data are disclosed, retention period, the possibility of exercising other rights regarding the data in question, the origin of the data, and the existence of automated decision-making), as well as to obtain a copy of the processed data.

- **Rectification** (Art. 16 of EU Regulation 679/2016): you have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning you without undue delay. In relation to the purposes of the processing, you also have the right to have incomplete data completed, including by providing a supplementary statement.

- **Erasure** (Art. 17 of EU Regulation 679/2016): you have the right to obtain from the Data Controller the erasure of personal data concerning you without undue delay, unless there are legal grounds preventing compliance with such a request (for example, the fulfillment of a legal obligation, or the establishment, exercise, or defense of a legal claim).

- **Restriction of processing** (Art. 18 of EU Regulation 679/2016): you have the right to obtain restriction of processing from the Data Controller under certain circumstances (e.g., when you contest the accuracy of the data; when processing is unlawful and you oppose erasure, requesting restriction instead; when you need the data for the establishment, exercise, or defense of legal claims; or when you have objected to processing pending verification of the Controller's legitimate grounds overriding yours).

- **Portability** (Art. 20 of EU Regulation 679/2016): you have the right to receive the personal data concerning you, in a structured, commonly used, and machine-readable format, and to transmit those data to another controller. The exercise of the right to portability must not, in any case, adversely affect the rights and freedoms of others.

h.1) RIGHT TO OBJECT

With regard to the right to object, recognized in relation to processing based on legitimate interest as referred to in point c.3) of this privacy notice (so-called soft spam), please note that you may exercise this right freely and independently by following the simple instructions included at the bottom of each communication you receive.

You may also contact the Data Controller directly, using any of the methods or formats you find most convenient, through the contact details provided in point a) of this notice.



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With respect to the exercise of the right to object, the Controller does not require you to provide any reasons or justifications for your request to no longer receive commercial or promotional communications.

However, should you wish to describe or present specific circumstances underlying your request, please note that the Controller is available to assess them to the extent strictly necessary and relevant, taking them into account for the future — after anonymization — for activities related to corporate quality management and, where appropriate, for re-evaluating the balance of interests underlying the processing carried out by the company.

Any additional information you may provide for this purpose will, in all cases, be treated with the utmost confidentiality and in full compliance with the principle of data minimization.

Processing may continue only where there are overriding legitimate grounds that prevail over your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims; in any case, such reasons will be duly communicated to you.

i) REQUESTS AND COMPLIANTS:

The protection of your privacy and your personal data is our priority. We are fully committed to handling any complaints or reports regarding the processing of your data with the utmost seriousness and diligence, making every effort to provide satisfactory responses. We also remain available to provide any clarifications you may require regarding data processing or to address your concerns.

However, if you so wish-or if you are not satisfied with our response-you may, at any time, lodge a complaint, duly signed with an authenticated, digital, or handwritten signature (in the latter case, accompanied by a copy of a valid identification document), also through a proxy if applicable, with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) using one of the following communication channels:

- Registered mail (A/R) addressed to: "Garante per la protezione dei dati personali, Piazza Venezia 11, 00187 Rome";
- Certified email (PEC) to: protocollo@pec.gpdp.it (this address only accepts messages sent from certified email accounts);
- In person, by delivering the complaint directly to the offices of the Italian Data Protection Authority, Piazza Venezia 11, Rome.

For further and up-to-date information on how to file complaints, we recommend consulting the dedicated page on the Authority's website: www.garanteprivacy.it, where you can also find the most recent documentation and instructions provided by the Authority.

Modena
P.F.B. S.r.l.
The Management

Last update: September 2025