

## Privacy Notice pursuant to Article 13 of EU Regulation 2016/679 (GDPR)

**IDROVER SRL**, represented by its pro tempore legal representative, with registered office in Colognola ai Colli (VR), Viale dell'Artigianato 28 (VAT No. 03823180231), acting as **Data Controller or Joint Controller**, pursuant to Article 26 of EU Regulation 2016/679 (hereinafter "GDPR"), together with the following companies of the **FLODRAULIC Group**:

- **FLODRAULIC EUROPE SRL**, represented by its pro tempore legal representative, with registered office in Granarolo dell'Emilia (BO), Via Don Minzoni 28-30-32, 40057 Cadriano;
- **FLODRAULIC INDUSTRIAL SRL**, represented by its pro tempore legal representative, with registered office in Granarolo dell'Emilia (BO), Via Don Minzoni 28, 40057 Cadriano;
- **FLODRAULIC MOTION SYSTEMS SRL**, represented by its pro tempore legal representative, with registered office in Sasso Marconi (BO), Via Cartiera 154, 40037 Borgonuovo;
- **FLUID CONVEYANCE SRL**, represented by its pro tempore legal representative, with registered office in 40013 Castel Maggiore (BO), Via Lirone 60/C;
- **EBI MOTION CONTROLS SRL**, represented by its pro tempore legal representative, with registered office in Granarolo dell'Emilia (BO), Via Andrea Costa 11/2, 40057 Cadriano;
- **CEIMU SRL**, represented by its pro tempore legal representative, with registered office in 37053 Cerea (VR), Via del Commercio 9.

Hereby informs you that your **personal data will be processed in compliance with the GDPR and with the national legislation on personal data protection** (hereinafter: "privacy legislation"). The Joint Controllers have entered into a **joint controllership agreement** pursuant to Article 26 GDPR.

The essential contents of this agreement are

available to data subjects upon request sent to the designated contact point:

[comitatoprivacy@flodrauliceurope.com](mailto:comitatoprivacy@flodrauliceurope.com).

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### 1. Purpose and legal basis of processing

Your personal data will be processed for the following purposes:

**1.1** To conclude contracts with the Controller and/or Joint Controllers and manage the related relationships during the pre-contractual, contractual, fiscal, administrative and accounting phases

*(legal basis: performance of a contract or pre-contractual measures and compliance with legal obligations pursuant to Art. 6(1)(b) and (c) GDPR).*

**1.2** To send commercial or promotional communications to the email address provided by the data subject within the framework of a previous contractual relationship with the Controller and/or Joint Controllers regarding products or services similar to those already supplied ("soft spam"), without prejudice to the right to object pursuant to Art. 21 GDPR in the first communication or thereafter

*(legal basis: legitimate interest pursuant to Art. 6(1)(f) GDPR).*

**1.3** To send commercial communications and/or advertising material and/or direct sales and/or market research (i.e. **direct marketing**) relating to products or services of the Controller and/or Joint Controllers through automated systems (e.g., email, SMS, fax, MMS, etc.) and traditional methods (postal mail and telephone contact)

*(legal basis: consent of the data subject pursuant to Art. 6(1)(a) GDPR).*

**1.4** To respond to requests for information submitted through the contact form available on the Controller's website **idrover.com**

*(legal basis: performance of a contract or pre-contractual measures pursuant to Art. 6(1)(b) GDPR).*

**1.5** To allow registration on the Controller's website **idrover.com**

*(legal basis: consent pursuant to Art. 6(1)(a) GDPR).*

**1.6** To subscribe to the group newsletter in order to receive updates about initiatives, products and services of the Joint Controllers  
(*legal basis: consent pursuant to Art. 6(1)(a) GDPR*).

**1.7** To establish, exercise or defend the rights of the Controller and/or Joint Controllers in legal proceedings  
(*legal basis: legitimate interest pursuant to Art. 6(1)(f) GDPR*).

**1.8** For accounting, tax and administrative purposes, customer data may be shared within the group  
(*legal basis: legitimate interest pursuant to Art. 6(1)(f) GDPR*).

**1.9** To facilitate navigation on the Controller's websites through technical and analytical cookies  
(*legal basis: performance of requested services pursuant to Art. 6(1)(b) GDPR*)  
and through marketing cookies  
(*legal basis: user consent pursuant to Art. 6(1)(a) GDPR*).

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## 2. Processing methods and data retention period

Your personal data will be processed using **technical and organizational security measures** that ensure a level of security appropriate to the risk, considering the state of the art and implementation costs, in compliance with privacy legislation, the provisions of the Italian Data Protection Authority and the limits set out in Article 5 GDPR.

Data retention is limited to the time necessary to achieve the purposes for which the data were collected, without prejudice to mandatory retention periods required by law or established by the Data Protection Authority.

In particular:

- For the purposes under **Art. 1.1 and 1.8**, personal data will be retained for **10 years after termination of the contract**, unless prescription periods are interrupted (Art. 2946 Italian Civil Code).
- For **direct marketing purposes (Art. 1.2 and 1.3)**, personal data will be retained **for no longer than 24 months from**

**collection**, without prejudice to the right to object in the case of soft spam (Art. 1.2) and the withdrawal of consent (Art. 1.3).

- For **Art. 1.4**, data will be retained for the time necessary to respond to the request.
- For **Art. 1.5 and 1.6**, data will be retained until the data subject withdraws consent.
- For **Art. 1.7**, data will be retained for the time necessary to exercise the Controller's or Joint Controllers' legal defense rights.
- For **Art. 1.9**, retention follows the periods indicated in the **Cookie Policy** published on the Controller's website.

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## 3. Recipients of the processing

For the purposes described above, personal data may be processed by **authorized personnel of the Controller and/or Joint Controllers**, duly informed and trained.

Data may also be disclosed, in compliance with legal obligations or for the correct execution of contractual relationships, to external parties acting as **independent data controllers** or **data processors appointed pursuant to applicable legislation**, such as:

- social security, welfare and insurance institutions
- trade associations
- tax and labor offices
- other companies within the group
- legal, commercial and tax advisory firms
- auditing companies
- banks and credit institutions.

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## 4. Nature of data provision

Providing personal data is **mandatory** to fulfill contractual and legal obligations. Therefore, failure to provide such data, in whole or in part, may make it impossible to perform the contractual relationship in all its phases. Providing data for other purposes is **optional**. Refusal to provide such data will only result in the inability to use certain services on the Controller's websites (such as subscribing to the

newsletter or submitting requests through the contact form) or to receive commercial communications and/or advertising for direct marketing purposes.

With reference to direct marketing activities, you may **exercise your right to object** to the processing of your data for such purposes (in the case of soft spam), in which case your data will no longer be processed for that purpose.

You may also **withdraw your consent at any time**, according to the procedures described in paragraph 7.

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### 5. Transfer of data abroad

Your data will **not be transferred to countries outside the European Union or to international organizations**.

Should it become necessary, for technical or operational reasons or for the execution of the contract, to rely on entities located outside the EU, such transfers will take place in compliance with applicable law, namely:

- based on an **adequacy decision of the European Commission**, or
- in the absence thereof, on the basis of **appropriate safeguards pursuant to Articles 46 or 47 GDPR** (e.g. standard contractual clauses adopted by the European Commission), or
- where a **derogation pursuant to Article 49 GDPR** applies.

For information regarding transfers of personal data collected through third-party cookies, please refer to the privacy policies of the respective third parties available on their websites (links available in the Cookie Policy published on the Controller's website).

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### 6. Rights of the data subject

As a data subject, you may exercise at any time the rights provided for in **Articles 15 to 22 GDPR**, including:

- access to your personal data and information about processing purposes, data categories, recipients, retention

periods, and the existence of automated decision-making including profiling;

- rectification of inaccurate personal data without undue delay;
- erasure of data where provided by law;
- restriction of processing or objection to processing where applicable;
- data portability, meaning the right to receive the data you provided in a structured, commonly used and machine-readable format and to transmit them to another controller where technically feasible;
- the right to lodge a complaint with the **Italian Data Protection Authority** (Art. 77 GDPR).

Where processing is based on consent, such consent **may be withdrawn at any time**, without affecting the lawfulness of processing carried out before the withdrawal.

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### 7. How to exercise your rights

Pursuant to Article 26(3) GDPR, data subjects may exercise their rights **against each Joint Controller**. In any case, data subjects may contact **IDROVER SRL** by sending a written communication to the company's registered office or by email at: [comitatoprivacy@flodrauliceurope.com](mailto:comitatoprivacy@flodrauliceurope.com)

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