

Dear
Customer/Supplier
To the attention of the Privacy Officer

DATA PROTECTION NOTICE FOR CUSTOMERS AND SUPPLIERS

Pursuant to the provisions of **Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR)**, we inform you that your personal data, collected in the course of commercial relationships between our companies and you, will be processed in compliance with Articles 13 and 14 of the GDPR. The processing will be carried out in accordance with principles of fairness, lawfulness, transparency, and the protection of your privacy and rights.

In accordance with Articles 13 and 14 of the GDPR, we provide the following information:

1. Purpose of Personal Data Processing

Your personal data will be processed by the Data Controller in compliance with the GDPR for the following purposes:

- a) To respond to your requests for information and/or contact, including sending related communications, and to ensure the proper execution of company activities and commercial relationships. This processing is necessary for the performance of the contractual relationship (which constitutes the legal basis) and includes operational, managerial, legal, statistical, marketing, and promotional activities
- b) With your prior explicit consent, to send you newsletters, promotional communications, commercial offers, and invitations to events via electronic means (e.g., email), including operational, managerial, legal, statistical, marketing, and promotional activities.

2. Data Controller

The **Data Controller** of your personal data is **A.C.E.M. S.R.L.**, represented by its legal representative, Mr. Giampaolo Mandaletti, with registered office at Grassobbio (BG), Via XXV Aprile n. 36, Italy. For any inquiries regarding data protection, you can contact us at: amm@flymax.com

The Data Controller is responsible for ensuring the lawful and proper processing of your personal data.

3. Provision of Data

Providing personal data is not mandatory; however, it is necessary for the correct execution of contractual, legal, and tax-related obligations. Failure to provide data may result in the inability to fulfill the contract or continue the commercial relationship.

Data processing may occur without consent in specific cases outlined in Article 6(1) of the GDPR, including but not limited to:

- Processing necessary for the performance of a contract to which the data subject is a party or for pre-contractual measures requested by the data subject.
- Processing necessary to fulfill a legal obligation imposed on the Data Controller.
- Processing necessary to protect the vital interests of the data subject or another natural person.
- Processing necessary for tasks carried out in the public interest or the exercise of official authority.

- Processing necessary for the legitimate interests of the Data Controller or third parties, provided that such interests do not override the data subject's rights and freedoms, particularly if the data subject is a minor.

4. Methods of Data Processing and Transfers

Your data will be processed both manually and electronically, using secure systems to ensure confidentiality and integrity. The processing will include all necessary operations as required for the stated purposes. Personal data will be stored on servers located within the European Union (EU). If data is transferred outside the EU or European Economic Area (EEA), it will occur only after ensuring an adequacy decision by the European Commissioner through the adoption of standard contractual clauses as required by Article 46 of GDPR.

5. Data Disclosure and Recipients

Your personal data may be disclosed, strictly within the scope of the stated purposes, to:

- Employees and collaborators of our company authorized to process personal data.
- Third parties, including companies, institutions, banks, credit institutions, business consultants, professional firms, trade associations, and networks of agents, both within and outside Italy, for purposes such as commercial transactions, market research, information systems management, and debt collection.

Personal data will not be subject to dissemination (i.e., made available to the public) without explicit consent.

6. Data Retention Period

Your personal data will be processed and stored **only for the time necessary** to fulfill contractual obligations and to comply with legal requirements. Specifically:

- Personal data will be retained **for the duration of the contractual relationship** and subsequently for the period required by tax, legal, and administrative obligations.
- Data processed for marketing purposes **will be retained until consent is withdrawn**.

7. Data Subject's Rights

Under Articles 15-22 of the GDPR, you have the following rights:

- Right to access: You can request confirmation of whether your personal data is being processed and obtain a copy of the data.
- Right to rectification: You can request the correction of inaccurate or incomplete data.
- Right to erasure ("right to be forgotten"): You can request the deletion of your personal data under certain conditions.
- Right to restriction of processing: You can request the limitation of data processing in certain cases.
- Right to data portability: You can receive your personal data in a structured format and transmit it to another data controller.
- Right to object: You can object to data processing based on legitimate interests or for direct marketing purposes.
- Right to withdraw consent: You can withdraw consent at any time without affecting the lawfulness of processing before withdrawal.

You also have the right to lodge a complaint with the Data Protection Authority (in Italy "Garante per la Protezione dei Dati Personali") via the official website www.garanteprivacy.it if you believe your rights have been violated.

Requests for the exercise of your rights can be sent to the Data Controller at **amm@flymax.com** or via registered mail to the address indicated in section 2.

Grassobbio (BG), _____

The Data Controller
A.C.E.M. S.R.L.

CONSENT FORM FOR THE PROCESSING OF PERSONAL DATA FOR MARKETING PURPOSES

(Pursuant to Articles 6 and 7 of the GDPR and Article 130 of Legislative Decree 196/2003)

The Data Subject

Name _____ Surname _____

Personal e-mail _____ Phone number _____

Company e-mail _____ In the capacity of legal representative of the company

_____ with registered office in _____

Having read the Data Protection Notice provided by **A.C.E.M. S.R.L.** pursuant to Articles 12, 13 and 14 of Regulation (EU) 2016/679,

and with specific reference to the processing of personal data for the purposes indicated below,

I hereby give my explicit, free and informed consent to **A.C.E.M. S.R.L.** for:

1. Direct marketing activities, including the sending of commercial offers, promotional communications and invitations to events concerning the company's products and/or services, using both traditional contact methods (e.g. participation in trade fairs, catalogues, promotional materials, brochures) and automated means of communication (e.g. social networks, mailing lists, SMS, telephone calls, push notifications, WhatsApp).

☐ YES ☐ NO

2. Subscription to the company's newsletter for the sending of commercial offers, promotional information and initiatives by A.C.E.M. S.R.L.

☐ YES ☐ NO

Date _____

The Data Subject _____
(full name / company name / legal representative – company stamp if applicable)

Signature _____