

## PRIVACY POLICY

### INFORMATION PROVIDED PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679 (GDPR)

ATS Packaging S.R.L., VAT No. 04250060284, with registered office at Via Stazione 82/B, 30035 Mirano (Venice - Italy), email address [info@ats-pack.com](mailto:info@ats-pack.com), acting as Data Controller, informs website users that personal data will be processed in accordance with the principles of lawfulness, fairness, transparency and protection of confidentiality and individual rights.

### PURPOSE OF THIS NOTICE

Pursuant to Article 13 of Regulation (EU) 2016/679 (GDPR), we inform you that personal data provided by users (such as name, surname, contact details, telephone number, email address and any other information submitted through the website forms) may be processed by ATS Packaging S.R.L.

As Data Controller, ATS Packaging S.R.L. provides information regarding the use of personal data and the rights granted to data subjects under the GDPR, enabling them to provide informed consent where required and to exercise their rights.

### PURPOSES OF PROCESSING

Personal data provided directly by the user, obtained from third parties or, where permitted by law, from public sources, may be processed for the following purposes:

#### A) Service Purposes (Article 6(1)(b) and 6(1)(c) GDPR)

Personal data may be processed without the data subject's prior consent where necessary to:

- manage requests for information and contact;
- establish and manage pre-contractual and contractual relationships;
- comply with legal, administrative, tax and regulatory obligations;
- protect the rights of the Data Controller, including in judicial proceedings;
- respond to specific requests submitted by the data subject prior to entering into a contractual relationship;
- provide the requested services through traditional or electronic communication channels.

#### B) Marketing Purposes (subject to the data subject's explicit consent pursuant to Article 7 GDPR)

Upon the specific and separate consent of the data subject, personal data may be processed for:

- direct marketing activities, including the sending of newsletters, commercial communications, promotional material and advertising relating to products and

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services offered by ATS Packaging S.R.L. via email, postal mail, SMS and/or telephone contact;

- indirect marketing activities, including the sending of commercial and promotional communications relating to products and services offered by third-party partners, business associates or affiliated companies via email, postal mail, SMS and/or telephone contact.

### Cookies

ATS Packaging S.R.L. informs users that, when accessing the websites <https://ats-pack.com> and <https://ats-pack.net>, cookies may be installed on their devices in accordance with the procedures described in the relevant Cookie Policy.

Personal data may also be communicated to third parties for the purposes described above and within the limits established by applicable legislation.

### METHODS OF PROCESSING

Personal data are processed through the operations referred to in Article 4 of the GDPR.

Data may be processed in paper form as well as through electronic, IT-based and automated systems.

ATS Packaging S.R.L. has implemented appropriate technical and organisational measures to prevent and mitigate the risk of personal data breaches.

Personal data shall be retained only for as long as necessary to fulfil the purposes described above and, in any case:

- for a maximum period of 10 years following the termination of the contractual relationship for service-related purposes;
- for a maximum period of 2 years from collection for marketing purposes.

### ACCESS TO DATA

Personal data may be accessed, for the purposes described above, by:

- employees and authorised collaborators of the Data Controller;
- external companies and service providers acting on behalf of the Data Controller as Data Processors pursuant to Article 28 GDPR.

### DATA DISCLOSURE

Without the need for specific consent and in the cases provided for by Article 6(1)(b) and Article 6(1)(c) GDPR, ATS Packaging S.R.L. may disclose personal data to public authorities, judicial authorities, supervisory bodies and any other entities to whom disclosure is required by law.

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Such entities will process personal data as independent Data Controllers.

Personal data will not be publicly disclosed.

## PROFILING

Personal data may be subject to profiling activities consisting of the collection and analysis of information intended to assess preferences, behaviours and habits for commercial purposes.

Profiling activities require the specific consent of the data subject. Refusal to provide such consent will not affect the ordinary development of any existing relationship with ATS Packaging S.R.L.

## DATA TRANSFER

Personal data are stored on servers located within the European Union.

However, should technical or organisational requirements make it necessary, ATS Packaging S.R.L. may transfer personal data to countries outside the European Union, ensuring compliance with applicable legislation and implementing the safeguards required under European law, including the adoption of Standard Contractual Clauses approved by the European Commission.

## NATURE OF DATA PROVISION AND CONSEQUENCES OF REFUSAL

The provision of personal data for service-related purposes is mandatory. Failure to provide such data may prevent the provision of the requested services.

The provision of personal data for marketing purposes is optional. Data subjects may decide not to provide their personal data or may subsequently withdraw previously granted consent. In such cases, they will no longer receive commercial, promotional or informational communications, without affecting access to the main services.

Personal data that are not required to be retained by law will be deleted within a maximum period of 24 months.

## DATA SUBJECT RIGHTS

Data subjects may exercise at any time the rights granted under Regulation (EU) 2016/679, including the right to:

- lodge a complaint with the competent supervisory authority;
- obtain information regarding the processing of their personal data;
- request the rectification of inaccurate or incomplete data;
- request the updating of personal data;
- withdraw consent where processing is based on consent;
- request the erasure of personal data where the legal requirements are met;

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- request restriction of processing in the cases provided for by the GDPR;
- object to the processing of personal data;
- object to profiling and direct marketing activities;
- request data portability where applicable;
- obtain human intervention in relation to decisions based solely on automated processing;
- receive information regarding the security measures adopted to protect personal data.

## HOW TO EXERCISE YOUR RIGHTS

Requests relating to the exercise of data subject rights may be submitted in writing to ATS Packaging S.R.L. using the contact details provided in this Privacy Policy or by email at [info@ats-pack.com](mailto:info@ats-pack.com).

Where a reserved area or personal online account is available, rights may also be exercised through the functionalities specifically provided for that purpose.

An updated list of Data Processors and authorised persons involved in the processing of personal data is available at the registered office of the Data Controller.