



STARCELL S.p.A. - Honeycomb & Composite Panels

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Data processing disclosure

Carlo Daveri, in his capacity as controller pursuant to Articles 13 and 14 of EU Regulation No. 679/2016 - General Data Protection Regulation ("GDPR"), in accordance with the obligations laid down by the legislator to protect privacy, hereby wishes to inform you in advance, both with regard to the use of your personal data and your rights, communicating the following:

a) CONTROLLER AND OTHER PROCESSORS

The controller is Carlo Daveri, owner of the company STARCELL SPA, tax code 07946310153, e-mail address infostarcell@legalmail.it, with headquarters in the Nerico Industrial Estate - 85020 - Pescopagano (PZ), Italy. The up-dated list of the processors, with the related areas of responsibility, is:

- Controller - Carlo Daveri

b) PERSONAL DATA PROCESSED

- Certified e-mail communications - Non-specific personal data (ID-related, accounting, financial, etc.) - Duration: Duration of the data processing 7 years

c) PURPOSES, LEGAL BASIS AND MANDATORY OR OPTIONAL NATURE OF THE PROCESSING

The source of the data as per point b is: Data provided by the data subject or obtained from public lists.

Main Purpose: Communication requirements.

Legal Basis: the data subject has expressed their consent to the processing of their personal data for one or more specific purposes.

d) RECIPIENTS

Exclusively for the purposes indicated above, the data will be revealed to both the internal staff units responsible in this connection and the outside contractors appointed to process the same, a list of whom is available care of the headquarters of the controller.

e) TRANSFERS

Personal Data are not transferred to Recipients outside the European Union.

f) DATA STORAGE

All the personal data conferred will be processed in observance of the principles of lawfulness, fairness, pertinence and proportionality, using only the methods, including computerised and on-line, strictly necessary for the pursuit of the purposes described above. In any event, the personal data will be kept for a period of time no longer than that strictly necessary for the achievement of the indicated purposes. The personal data whose storage is not necessary or in relation to



which the storage is not envisaged by current legislation, with regard to the indicated purposes, will be cancelled or transformed into anonymous form. It is pointed out that the information systems used for handling the information collected are configured, as from origin, in such a way as to minimise the use of the data.

g) YOUR RIGHTS

Please note that the data subject has the right to access the data which concerns them at any time, making their request to our controller appointed to reply, using the contact information indicated below:

- Controller - Carlo Daveri - Nerico Industrial Estate - 85020 - Pescopagano (PZ), Italy - 02-6883537 - infostarcell@legalmail.it

In the same manner they can exercise, with regard to the processing in question, the following rights: Information, Access to the data, Rectification of the data, Cancellation of the data, Limitation of the processing, Portability of the data, Lodge complaints with the supervisory authorities, Withdrawal of consent (The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal).

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- Controller - Carlo Daveri

i) PERSONAL DATA PROCESSED

- Personal information, contact details, accounting records of the services provided, financial, debt information, due dates, requests, etc. - Non-specific personal data (ID-related, accounting, financial, etc.) - Duration: Information kept for the duration of the contract. On conclusion, only the information required by legal obligations will be kept.

j) PURPOSES, LEGAL BASIS AND MANDATORY OR OPTIONAL NATURE OF THE PROCESSING

The source of the data as per point b is: Provided directly by the data subject.

Main Purpose: Perform the tasks envisaged by the contract.

Legal Basis: the processing is necessary for the execution of a contract which the data subject is party to or for the execution of pre-contractual measures adopted upon the request of the same.

The data subject is obliged to provide the personal data.

Possible consequences of the failure to provide the personal data: Hinder the finalisation of the contract or the supply of the service requested by the data subject.



k) RECIPIENTS

Exclusively for the purposes indicated above, the data will be revealed to both the internal staff units responsible in this connection and the outside contractors appointed to process the same, a list of whom is available care of the headquarters of the controller.

l) TRANSFERS

Personal Data are not transferred to Recipients outside the European Union.

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- Controller - Carlo Daveri



p) PERSONAL DATA PROCESSED

- Recipient and sender contact list, communications sent and received via e-mail or equivalent communication instruments - Non-specific personal data (ID-related, accounting, financial, etc.) - Duration: Duration of the data processing 5 years

q) PURPOSES, LEGAL BASIS AND MANDATORY OR OPTIONAL NATURE OF THE PROCESSING

The source of the data as per point b is: Data provided by the data subject.

Main Purpose: Communication requirements.

Legal Basis: the data subject has expressed their consent to the processing of their personal data for one or more specific purposes.

r) RECIPIENTS

Exclusively for the purposes indicated above, the data will be revealed to both the internal staff units responsible in this connection and the outside contractors appointed to process the same, a list of whom is available care of the headquarters of the controller.

s) TRANSFERS

Personal Data are not transferred to Recipients outside the European Union.

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- Controller - Carlo Daveri

w) PERSONAL DATA PROCESSED

- Archive relating to invoices issued/received, bank transactions, expenditure documentation, etc. - Non-specific personal data (ID-related, accounting, financial, etc.) - Duration: According to the provisions of law.

x) PURPOSES, LEGAL BASIS AND MANDATORY OR OPTIONAL NATURE OF THE PROCESSING

The source of the data as per point b is: Data provided by the data subject.

Main Purpose: Business organisation and control and execution of legal obligations.

Legal Basis: the processing is necessary for the fulfilment of a legal obligation which the controller is subject to.

y) RECIPIENTS

Exclusively for the purposes indicated above, the data will be revealed to both the internal staff units responsible in this connection and the outside contractors appointed to process the same, a list of whom is available care of the headquarters of the controller.

z) TRANSFERS

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aa) DATA STORAGE

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