



## Privacy Policy

### 1. This Notice

This Notice is issued by Prime Metals Network Srl ("PRIMEN", "we", "us" and "our") and is addressed to individuals outside our organisation with whom we interact, including customers, shareholders, investors, visitors to our Sites, other users of our products or services, and visitors to our premises (together, "you"). Defined terms used in this Notice are explained in Section (17) below.

For the purposes of this Notice, the Controller is PRIMEN. Contact details for PRIMEN locations are provided in Section (16) below.

This Notice may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Notice carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Notice.

### 2. Collection of Personal Data

We collect or obtain Personal Data about you from the following sources:

- a) Data provided to us: We obtain Personal Data when those data are provided to us (e.g., where you contact us via email or telephone, or by any other means, or when you provide us with your business card, or when you submit a job application).
- b) Relationship data: We collect or obtain Personal Data in the ordinary course of our relationship with you (e.g., we provide a service to you, or to your employer).
- c) Registration details: We collect or obtain Personal Data when you use, or register to use, any of our Sites, products, or services.
- d) Third party information: We collect or obtain Personal Data from third parties who provide it to us (e.g., credit reference agencies; law enforcement authorities; etc.).

### 3. Creation of Personal Data

We create Personal Data about you in certain circumstances, such as records of your interactions with us, and details of your purchase history.

### 4. Categories of Personal Data we Process

We Process the following categories of Personal Data about you:

- a) Personal details:
- b) Demographic information:

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- c) Contact details:
- d) Consent records:
- e) Purchase details: Payment details:
- f) Employer details:

## 5. Sensitive Personal Data

We do not seek to collect or otherwise Process Sensitive Personal Data in the ordinary course of our business. Where it becomes necessary to Process your Sensitive Personal Data for any reason, we rely on one of the following legal bases:

- a) Compliance with applicable law: We may Process your Sensitive Personal Data where the Processing is required or permitted by applicable law (e.g., to comply with our diversity reporting obligations);
- b) Detection and prevention of crime: We may Process your Sensitive Personal Data where the Processing is necessary for the detection or prevention of crime (e.g., the prevention of fraud);
- c) Establishment, exercise or defence of legal rights: We may Process your Sensitive Personal Data where the Processing is necessary for the establishment, exercise or defence of legal rights; or
- d) Consent: We may Process your Sensitive Personal Data where we have, in accordance with applicable law, obtained your prior, express consent prior to Processing your Sensitive Personal Data (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

If you provide Sensitive Personal Data to us, you must ensure that it is lawful for you to disclose such data to us, and you must ensure a valid legal basis applies to the Processing of those Sensitive Personal Data.

## 6. Purposes of Processing and legal bases for Processing

We Process Personal Data for the following purposes: providing products, and services to you; compliance checks; operating our business; communicating with you; managing our IT systems; health and safety; financial management; conducting surveys; ensuring the security of our premises and systems; conducting investigations where necessary; compliance with applicable law; improving our products, and services; fraud prevention; and recruitment and job applications.

The purposes for which we Process Personal Data, subject to applicable law, and the legal bases on which we perform such Processing, are as follows:

### Processing activity

Provision of products, and services: providing our, products, or services; providing promotional items upon request; and communicating with you in relation to those, products, or services.

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#### **Legal basis for Processing**

- The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of providing our (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

#### **Processing activity**

Compliance checks: fulfilling our regulatory compliance obligations; 'Know Your Client' (KYC) checks; and confirming and verifying your identity; use of credit reference agencies; and screening against government and/or law enforcement agency sanctions lists and other legal restrictions

#### **Legal basis for Processing**

- The Processing is necessary for compliance with a legal obligation; or
- The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of fulfilling our regulatory and compliance obligations (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

#### **Processing activity**

Operating our business: operating and managing our Sites, our products, and our services; providing content to you; displaying advertising and other information to you; communicating and interacting with you via our Sites, our products, or our services; and notifying you of changes to any of our Sites, our products, or our services.

#### **Legal basis for Processing**

- The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of providing our Sites, our products, or our services to you (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

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### Processing activity

Communications communicating with you via any means (including via email, telephone, text message, social media, post or in person) news items and other information in which you may be interested, subject always to obtaining your prior opt-in consent to the extent required under applicable law; maintaining and updating your contact information where appropriate; and obtaining your prior, opt-in consent where required.

#### Legal basis for Processing

- The Processing is necessary in connection with any contract that you have entered into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of contacting you, subject always to compliance with applicable law (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

### Processing activity

Management of IT systems: management and operation of our communications, IT and security systems; and audits (including security audits) and monitoring of such systems.

#### Legal basis for Processing

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of managing and maintaining our communications and IT systems (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

### Processing activity

Health and safety: health and safety assessments and record keeping; providing a safe and secure environment at our premises; and compliance with related legal obligations.

#### Legal basis for Processing

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of managing and maintaining our communications and IT systems (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- The Processing is necessary to protect the vital interests of any individual.

### Processing activity

Financial management: sales; finance; corporate audit; and vendor management.

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#### **Legal basis for Processing**

- We have a legitimate interest in carrying out the Processing for the purpose of managing and operating the financial affairs of our business (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

#### **Processing activity**

Surveys: engaging with you for the purposes of obtaining your views on our Sites, our products, or our services.

#### **Legal basis for Processing**

- We have a legitimate interest in carrying out the Processing for the purpose of conducting surveys, satisfaction reports and market research (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

#### **Processing activity**

Security: physical security of our premises (including records of visits to our premises); CCTV recordings; and electronic security (including login records and access details).

#### **Legal basis for Processing**

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of ensuring the physical and electronic security of our business and our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

#### **Processing activity**

Investigations: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.

#### **Legal basis for Processing**

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of establishing, exercising or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

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#### Processing activity

Legal proceedings: establishing, exercising and defending legal rights.

##### Legal basis for Processing

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, breaches of our policies and applicable laws (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

#### Processing activity

Legal compliance: compliance with our legal and regulatory obligations under applicable law.

##### Legal basis for Processing

The Processing is necessary for compliance with a legal obligation.

#### Processing activity

Improving our Sites, products, and services: identifying issues with our Sites, our products, or our services; planning improvements to our Sites, our products, or our services; and creating new Sites, products, or services.

##### Legal basis for Processing

- We have a legitimate interest in carrying out the Processing for the purpose of improving our Sites, our products, or our services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

#### Processing activity

Fraud prevention: Detecting, preventing and investigating fraud.

##### Legal basis for Processing

- The Processing is necessary for compliance with a legal obligation (especially in respect of applicable employment law); or
- We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, fraud (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

#### Processing activity

Recruitment and job applications: recruitment activities; advertising of positions; interview activities; analysis of suitability for the relevant position; records of hiring decisions; offer details; and acceptance details.

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#### Legal basis for Processing

- The Processing is necessary for compliance with a legal obligation (especially in respect of applicable employment law); or
- We have a legitimate interest in carrying out the Processing for the purpose of recruitment activities and handling job applications (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

### 7. Disclosure of Personal Data to third parties

We may disclose Personal Data between the PRIMEN locations listed in Section (16) below, for legitimate business purposes and the operation of our Sites, products, or services to you, in accordance with applicable law. In addition, we disclose your Personal Data to:

- a) you and, where appropriate, your appointed representatives;
- b) legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- c) accountants, auditors, banks and financial institutions, lawyers, recruitment agents, consultants and other outside professional advisors to Prime Metals Network Srl, subject to binding contractual obligations of confidentiality;
- d) third party Processors (such as payment services providers; shipping companies; etc.), located anywhere in the world, subject to the requirements noted below in this Section (7);
- e) any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- f) any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;
- g) any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); and
- h) any relevant third-party provider, where our Sites use third party advertising, plugins or content. If you choose to interact with any such advertising, plugins or content, your Personal Data may be shared with the relevant third-party provider. We recommend that you review that third party's privacy policy before interacting with its advertising, plugins or content.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

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## 8. International transfer of Personal Data

Because of the international nature of our business, we transfer Personal Data between the PRIMEN locations listed in Section (16) below, and to third parties as noted in Section (7) above, in connection with the purposes set out in this Notice. For this reason, we transfer Personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located.

Where we transfer your Personal Data from the EEA to recipients located outside the EEA who are not in Adequate Jurisdictions, we do so on the basis of Standard Contractual Clauses. You are entitled to request a copy of our Standard Contractual Clauses using the contact details provided in Section (16) below.

Please note that when you transfer any Personal Data directly to PRIMEN locations outside the EEA, we are not responsible for that transfer of your Personal Data. We will nevertheless Process your Personal Data, from the point at which we receive those data, in accordance with the provisions of this Notice.

## 9. Data security

We have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information via the internet is not completely secure.

Although we will implement all reasonable measures to protect your Personal Data, we cannot guarantee the security of your data transmitted to us using the internet – any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us are sent securely.

## 10. Data accuracy

We take every reasonable step to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

## 11. Data minimisation

We take every reasonable step to ensure that your Personal Data that we Process are limited to the Personal Data reasonably necessary in connection with the purposes set out in this Notice.

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## 12. Data retention

We take every reasonable step to ensure that your Personal Data are only Processed for the minimum period necessary for the purposes set out in this Notice. The criteria for determining the duration for which we will retain your Personal Data are as follows:

- 1) we will retain Personal Data in a form that permits identification only for as long as:
  - a) we maintain an ongoing relationship with you (e.g., where you are a user of our services),
  - b) your Personal Data are necessary in connection with the lawful purposes set out in this Notice, for which we have a valid legal basis (e.g., where your personal data are included in a contract between us and you or employer, and we have a legitimate interest in processing those data for the purposes of operating our business and fulfilling our obligations under that contract; or where we have a legal obligation to retain your Personal Data),

plus:

- 2) the duration of:
  - a) any applicable limitation period under applicable law (i.e., any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data are relevant); and
  - b) an additional two (2) month period following the end of such applicable limitation period (so that, if a person brings a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim),

and:

- 3) in addition, if any relevant legal claims are brought, we continue to Process Personal Data for such additional periods as are necessary in connection with that claim.

During the periods noted in paragraphs (2)(a) and (2)(b) above, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will permanently delete or destroy the relevant Personal Data.

## 13. Your legal rights

Subject to applicable law, you may have the following rights regarding the Processing of your Relevant Personal Data:

- the right not to provide your Personal Data to us (however, please note that we will be unable to provide you with the full benefit of our Sites, products, or services, if you do not provide us with your Personal Data – e.g., we might not be able to process your requests without the necessary details);

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- the right to request access to, or copies of, your Relevant Personal Data, together with information regarding the nature, Processing and disclosure of those Relevant Personal Data;
- the right to request rectification of any inaccuracies in your Relevant Personal Data;
- the right to request, on legitimate grounds:
  - a) erasure of your Relevant Personal Data; or
  - b) restriction of Processing of your Relevant Personal Data;
- the right to have certain Relevant Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;
- where we Process your Relevant Personal Data on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Data in reliance upon any other available legal bases); and
- the right to lodge complaints regarding the Processing of your Relevant Personal Data with a Data Protection Authority (in particular, the Data Protection Authority of the EU Member State in which you live, or in which you work, or in which the alleged infringement occurred, each if applicable).

Subject to applicable law, you may also have the following additional rights regarding the Processing of your Relevant Personal Data:

- the right to object, on grounds relating to your particular situation, to the Processing of your Relevant Personal Data by us or on our behalf; and
- the right to object to the Processing of your Relevant Personal Data by us or on our behalf for direct marketing purposes.

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Notice, or about our Processing of your Personal Data, please use the contact details provided in Section (P) below. Please note that:

- in some case it will be necessary to provide evidence of your identity before we can give effect to these rights; and
- where your request requires the establishment of additional facts (e.g., a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

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## 14. Cookies and similar technologies

We do not Process any Personal Data by using first party Cookies or similar technologies on our site, however there may be third party cookie for which we do not control their settings for example WordPress or Google. If you want to change your cookie preferences, check the third-party websites for information on how to manage their cookies.

## 15. Terms of Use

All use of our Sites, products, or services is subject to our Terms of Use. We recommend that you review our Terms of Use regularly, in order to review any changes, we might make from time to time.

## 16. Contact Details

PRIME METALS NETWORK S.r.l. can be contacted via [info@primen.eu](mailto:info@primen.eu) or by mail at its office:

Address – Via Monte Santo 33/A, 31039 Riese pio X (TV), Italy

Telephone – 0039 0423.199.21.08

## 17. Definitions

“**Adequate Jurisdiction**” means a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.

“**Cookie**” means a small file that is placed on your device when you visit a website (including our Sites). In this Notice, a reference to a “Cookie” includes analogous technologies such as web beacons and clear GIFs.

“**Controller**” means the person or entity that decides how and why Personal Data are Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.

“**Data Protection Authority**” means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.

“**EEA**” means the European Economic Area.

“**Personal Data**” means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

“**Process**”, “**Processing**” or “**Processed**” means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“**Processor**” means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).

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“**Profiling**” means any form of automated Processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

“**Relevant Personal Data**” means Personal Data in respect of which we are the Controller.

“**Sensitive Personal Data**” means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that are deemed to be sensitive under applicable law.

“**Standard Contractual Clauses**” means template transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission.

“**Site**” means any website operated, or maintained, by us or on our behalf.

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