

|                                                                                               |                                                                                                                                                                                                                                                                                              |                            |                                                      |
|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|------------------------------------------------------|
| SANDRINI METALLI S.p.A.<br>a Socio Unico<br>Via P. Togliatti 18/A<br>24062 Costa Volpino (BG) | <p align="center"><b>PRIVACY NOTICE ON THE<br/>PROCESSING OF PERSONAL DATA –<br/>CUSTOMERS AND SUPPLIERS</b></p> <p align="center">Pursuant to Regulation (EU) 2016/679<br/>(General Data Protection Regulation –<br/>GDPR) and Italian Legislative Decree No.<br/>196/2003, as amended.</p> | Mod. 03/privacy<br>Rev. 04 | <div>Pag 1 of 3</div> <div>Date<br/>01/07/2026</div> |
|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|------------------------------------------------------|

### Privacy Notice on the Processing of Personal Data for Customers and Suppliers

(Pursuant to Regulation (EU) 2016/679 – General Data Protection Regulation ("GDPR") and Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018).

**SANDRINI METALLI S.p.A. a Socio Unico** (hereinafter, the "Company" or the "Data Controller") hereby informs you that, in connection with the negotiation, execution, performance and management of contractual relationships, it may process personal data, as defined under Regulation (EU) 2016/679 and Legislative Decree No. 196/2003, as amended by Legislative Decree No. 101/2018, relating to employees, contractors and representatives of customers and suppliers.

Such personal data, including but not limited to first name, surname, personal identification data, contractual information, bank account details and any other information necessary for the purposes described below, may be collected directly from the data subject and/or from duly authorized third parties.

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR"), the following information is provided regarding the processing of personal data.

#### 1) Data Controller and Contact Details:

SANDRINI METALLI S.p.A. a Socio Unico, Via P. Togliatti 18/A, 24062 Costa Volpino (BG)

E-mail: [info@sandrinimetalli.it](mailto:info@sandrinimetalli.it)

2) The Data Controller has not appointed a **Data Protection Officer (DPO)**.

#### 3) Purposes of Processing and Legal Basis:

a) Processing without the data subject's consent (Articles 6(1)(b), 6(1)(c) and 6(1)(f) GDPR) Personal data are processed for the following purposes:

- carrying out activities strictly related and instrumental to the negotiation, establishment, management and performance of the contractual relationship with the Company, including, by way of example:
  - management of customer and supplier records;
  - customer and supplier qualification procedures;
  - management of purchase and sales requests;
  - general administration of contractual relationships;
  - warehouse management, inbound and outbound logistics, transportation management and shipment tracking;
  - management of technical documentation and archiving of invoices and transport documents;
  - maintenance management;
- complying with obligations arising under applicable European Union, national and regional legislation, as well as regulations and provisions issued by competent authorities, including administrative and accounting obligations such as accounting, treasury management and invoicing activities (for example, invoice verification and registration), in accordance with applicable laws;
- establishing, exercising or defending the legal rights of the Data Controller, including in judicial proceedings;
- managing logical access control to the Company's information systems in order to ensure the security of persons, assets and corporate information systems;
- complying with the provisions of Legislative Decree No. 24/2023 implementing the EU Whistleblowing Directive, within the scope and limits established by the applicable legislation.

The **legal bases** for the above processing activities are:

- the performance of a contract to which the data subject is a party or the implementation of pre-contractual measures taken at the request of the data subject;
- compliance with a legal obligation to which the Data Controller is subject;
- the legitimate interests pursued by the Data Controller.

|                                                                                               |                                                                                                                                                                                                                                                      |                            |                    |
|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|--------------------|
| SANDRINI METALLI S.p.A.<br>a Socio Unico<br>Via P. Togliatti 18/A<br>24062 Costa Volpino (BG) | <b>PRIVACY NOTICE ON THE<br/>PROCESSING OF PERSONAL DATA –<br/>CUSTOMERS AND SUPPLIERS</b><br><br>Pursuant to Regulation (EU) 2016/679<br>(General Data Protection Regulation –<br>GDPR) and Italian Legislative Decree No.<br>196/2003, as amended. | Mod. 03/privacy<br>Rev. 04 | Pag 2 of 3         |
|                                                                                               |                                                                                                                                                                                                                                                      |                            | Date<br>01/07/2026 |

#### 4) Nature of the Provision of Personal Data and Consequences of Failure to Provide Data

Without prejudice to cases where the provision of personal data is mandatory pursuant to applicable laws (as referred to in Section 3(a)), the provision of personal data is generally voluntary, although it may be necessary for the negotiation, conclusion, management or performance of the contractual relationship.

Failure to provide the requested personal data may make it impossible for the Company to enter into or perform the relevant contractual relationship.

#### 5) Methods of Processing and Data Retention Period

Personal data are processed through the operations referred to in Article 4(2) GDPR, including collection, recording, organization, storage in paper and electronic archives, consultation, processing, adaptation, modification, retrieval, selection, extraction, comparison, use, disclosure, interconnection, restriction, erasure and destruction, where the legal grounds for processing no longer exist.

Processing is carried out by means of manual, electronic and IT-based tools using procedures strictly related to the purposes for which the data were collected and in a manner ensuring their security, integrity and confidentiality in compliance with applicable legislation.

The Company implements technical and organizational measures designed to safeguard personal data, which are regularly updated and reviewed to ensure their effectiveness and reliability.

Personal data will be retained for the period necessary to achieve the purposes described above and, in any event, for no longer than ten (10) years following the termination of the contractual relationship for the purposes described herein.

Upon expiry of the applicable retention periods, personal data will be securely deleted or irreversibly anonymized, taking into account applicable technical deletion and backup procedures.

#### 6) Access to Personal Data

For the purposes described in Section 3(a), personal data may be accessed by:

- employees and collaborators of the Data Controller who have been duly authorized to process personal data and, where applicable, by system administrators;
- third-party service providers performing outsourced activities on behalf of the Data Controller, acting as Data Processors pursuant to Article 28 GDPR.

#### 7) Disclosure of Personal Data

For the purposes referred to in Section 3(a), and only to the extent necessary in relation to the specific contractual relationship between the data subject and SANDRINI METALLI S.p.A. a Socio Unico, personal data may be disclosed to organizational entities, public authorities or third parties assisting the Company in providing its services.

Such recipients may include, by way of example:

- banks and financial institutions;
- insurance companies;
- public authorities and governmental bodies;
- chartered accountants and tax advisors;
- payroll consultants;
- occupational health and safety consultants;
- IT consultants;
- debt collection agencies.

|                                                                                               |                                                                                                                                                                                                                                                      |                            |                    |
|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|--------------------|
| SANDRINI METALLI S.p.A.<br>a Socio Unico<br>Via P. Togliatti 18/A<br>24062 Costa Volpino (BG) | <b>PRIVACY NOTICE ON THE<br/>PROCESSING OF PERSONAL DATA –<br/>CUSTOMERS AND SUPPLIERS</b><br><br>Pursuant to Regulation (EU) 2016/679<br>(General Data Protection Regulation –<br>GDPR) and Italian Legislative Decree No.<br>196/2003, as amended. | Mod. 03/privacy<br>Rev. 04 | Pag 3 of 3         |
|                                                                                               |                                                                                                                                                                                                                                                      |                            | Date<br>01/07/2026 |

Such recipients shall process personal data either as independent Data Controllers or as Data Processors appointed pursuant to Article 28 GDPR, as applicable.

Personal data will not be disseminated or made publicly available.

#### 8) Transfer of Personal Data to Third Countries

Personal data may be stored on servers located within the European Union.

Where necessary, the Data Controller reserves the right to transfer data to servers located outside the European Union.

In such cases, the Data Controller shall ensure that any international transfer of personal data is carried out in compliance with applicable data protection legislation, including, where required, by entering into the Standard Contractual Clauses approved by the European Commission or by relying on any other lawful transfer mechanism provided under Chapter V of the GDPR.

#### 9) Rights of the Data Subject

As a data subject, you are entitled to exercise the rights set out in Articles 15 to 21 of the GDPR, including the right to:

I. obtain confirmation as to whether or not personal data concerning you are being processed and, where that is the case, obtain access to such personal data;

II. obtain information regarding:

- a) the source of the personal data;
- b) the purposes and methods of processing;
- c) the logic involved in any automated processing;
- d) the identity and contact details of the Data Controller, any Data Processors and, where applicable, the designated representative; the recipients or categories of recipients to whom the personal data have been or may be disclosed;

III. obtain:

- a) the rectification of inaccurate personal data and the completion of incomplete personal data;
- b) the erasure, anonymization or restriction of personal data processed in breach of the law, including data whose retention is no longer necessary for the purposes for which they were collected or subsequently processed;
- c) confirmation that any rectification, erasure or restriction has been notified to the recipients to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort;

IV. object, in whole or in part:

- a) on grounds relating to your particular situation, to the processing of personal data concerning you where such processing is based on the legitimate interests of the Data Controller.

Where applicable, you also have the rights provided for under Articles 16 to 21 GDPR, including the right to rectification, erasure ("right to be forgotten"), restriction of processing, data portability and the right to object.

You also have the right to lodge a complaint with the competent Supervisory Authority responsible for data protection.

The Data Controller **does not intend** to process the personal data collected for purposes **other than those for which they were originally collected**.