

## INFORMATION NOTICE L.C.M. ITALIA SpA

L.C.M. Italia SpA (hereinafter also LCM or the Company) releases this information notice pursuant to article 13 of the EU Regulation 2016/679 (hereinafter "GDPR"), and Italian legislative decree n°196/2006 (and subsequent amendments and additions), in compliance with the principles of correctness, lawfulness, transparency and confidentiality, without prejudice to the modifications and adaptations necessary following National or European laws and/or measures by the Supervisory Authorities subsequent to the publication of this information notice.

### 1. Source of personal data

Personal Data are provided by the Customer during the sale phase. Data of the potential Customer (hereinafter "Prospect") are collected in the pre-contractual stage, when an offer is requested.

### 2. Nature of personal data

The processing object of the present information notice concerns "common" personal data: i.e. corporate name/personal data, tax code/VAT registration number, telephone number, e-mail address, IBAN.

### 3. Data processing purposes

Personal data are collected and processed for the following purposes:

- a) **Pre-contractual purposes:** to answer Prospect and/or Customer's requests and for any other instrumental activity for the subscription and/or activation of the services offered by LCM;
- b) **Contractual purposes:** for the sale of products and services including support and accessories services eventually requested by the Customer; for technical, administrative and accounting management of complaints and disputes; for sending information and service communications;
- c) **Purposes of fulfilment of obligations provided for by EU and national laws**, including laws, regulations and provisions issued by legitimated Authorities, as well as for purposes related to the ascertainment and repression of crimes;
- d) **Purposes related to the contract** to proceed with the sale of certain products or services where are used some personal data from archives or public records related to any protests, inscriptions or detrimental transcripts (such as foreclosures, bankruptcy proceedings, mortgages, court applications) visa and balance sheet data. These data are acquired through access to the information systems of authorized companies and are processed, where necessary, exclusively for checking the reliability and punctuality of payments. The Company may also process data on the status and punctuality of the Customer in the payments of the Services provided also in the past: such information, once acquired by LCM, will be stored and processed for the protection of credit, to evaluate any further accessions and/or contractual proposals that can be subscribed by the Customer;

### 4. Methods and logic of processing

The processing of personal data is carried out by L.C.M. Italia SpA using both manual and electronic automated means. The processing of personal data will be carried out with logic of organization and processing of Customer/Prospect data related to the purposes set out in this statement, however, in order to ensure the security and confidentiality of data. More precisely, data will be stored on servers, protected by subtraction or alteration by means of special archiving and computer security systems.

**L.C.M. Italia SpA**  
con Socio Unico

**DIREZIONE / STABILIMENTO/  
SEDE LEGALE** Via dei Ciclamini, 8  
20020 Vanzaghella (Milano), Italia  
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Fax +39 0331 308501  
[www.lcmitalia.com](http://www.lcmitalia.com)

CAPITALE SOCIALE € 2.400.000 int. vers.  
Iscritta al Reg Imp. Milano al n°01401920127  
REA 1531181  
Codice Fiscale n° 01401920127  
P. IVA n° 02651500122  
PEC: LCMITALIA@CERTIMPRESE.IT

Azienda soggetta a direzione e  
coordinamento da parte di EASTLINK  
LANCKER PLC

## 5. Data retention period

Personal data will be processed by the Company for the duration of the contract and subsequently to assert or protect their rights. After termination of the signed contract, data may be processed exclusively for administrative and/or legal purposes (i.e. in cases of offenses such as fines damage, theft, etc.) and to implement obligations arising from the applicable regulatory and regulatory framework. At the end of the period necessary for the aforementioned purposes, data are deleted.

## 6. Data recipients and parties authorised to process data

For the pursuit of the aforementioned purposes, L.C.M. Italia SpA may need to communicate in Italy personal data of Customers/Prospects to third parties to give full execution to the contract, in fulfilment of legal obligations or for the performance of activities instrumental to the provision of services requested. These subjects belong to the following categories:

- (a) Public authorities and supervisory and control bodies when required by specific regulatory, regulatory and authorization provisions;
- (b) Subjects who perform on behalf of the Company technical or organizational tasks; subjects that provide support services or instrumental to contractual execution; subjects that perform services of acquisition, processing and processing of data necessary for the use of services for customers; subjects that carry out transmission, enveloping, transport and sorting of communications to the Customer; subjects that carry out archiving and data entry activities; studies and companies in the field of assistance and legal advice; subjects that carry out control, revision and certification of the activities carried out by LCM also in the interest of its Customers and users; factoring companies, banks or credit institutions and credit card companies; insurance companies;
- (c) to external companies operating in the field of credit recovery including payment extensions, when permitted by current legislation, for purposes of prevention and control of insolvency risk, fraud control and credit protection, to this end appoint external managers of the data processing;
- (d) Companies of the same group to which the Company belongs for administrative-accounting purposes.

The subjects belonging to the above categories process personal data as autonomous Data Controllers or as external Data Processors specifically appointed by LCM.

The list of External Processors is available to the data subject, who explicit request at the registered office of the Data Controller.

All employees, consultants, collaborators and / or any other "natural person", pursuant to Art. 4 let. 10 GDPR, which carry out their activities based on the instructions received from L.C.M. Italia SpA, are named "authorised subjects". LCM gives the managers and authorised subjects adequate operational instructions, with particular reference to the adoption of organizational technical measures adequate to guarantee the confidentiality and security of data.

## 8. Nature of consent and legal basis of the processing

The conferment of personal data by the Customer is necessary for the stipulation and execution of contractual relationships, to fulfil legal obligations or for reasons of legitimate interest as specified in the purposes described in point 3 below. a), b), c) and d) (in accordance with Article 6 letters b), c) and f) GDPR). Any refusal would make it impossible for LCM to proceed with the execution of the stipulated contract.

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## 9. Further Information

Any updates to this information notice will be immediately made available on the website and through commercial channels of L.C.M. Italia SpA.

## 10. Data Controller

The Data Controller is L.C.M. Italia SpA through of its Legal Representative, with registered office in Via Dei Ciclamini, n°8 20020 – Vanzaghella (MI), Italy.

## 11. Data subjects' rights

In accordance with articles 15 and following of the EU Regulation 2016/679, it gives the data subject the exercise of specific rights towards us. In particular the right to:

- obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, even if not yet registered, access to the same data and their source, as well as to the purposes, retention times, methods of processing and of the logic applied in case of processing carried out with automated tools;
- revoke the consent given in relation to processing for marketing purposes, without prejudice to the lawfulness of the processing put in place up to that time;
- receive in a structured format, in common use and readable by automatic device the personal data processed and, unless it is technically feasible, transmit personal data directly to another Data Controller;
- obtain the cancellation, transformation into anonymous form or blocking of data conservation is not necessary in relation to purposes for which data were collected and processed;
- obtain the updating, rectification and integration of data processed;
- oppose, in whole or in part, for legitimate reasons, to the processing of personal data concerning him / her, even if pertinent to the purpose of collection;
- to propose a complaint to the Supervisory Authorities.

It should be noted that the exercise of these rights must not prejudice and / or damage the rights and freedoms of others. You may exercise these rights at any time by writing to L.C.M. Italia SpA, Via Dei Ciclamini, n°8 20020 – Vanzaghella (MI), Italy or by contacting the following e-mail address: [privacy@lcmitalia.com](mailto:privacy@lcmitalia.com)

It is understood that, where requests are submitted by electronic means, the information will be provided free of charge and in a commonly used electronic format.

If the requests of data subject are manifestly unfounded or excessive, due to their repetitive nature, the Company may alternatively: charge a reasonable service fee taking into account the administrative costs incurred to provide the information or communication or take the required action; or refuse to fulfil the request. In both circumstances, the Company provides an adequate justification for the data subject.

The Data subject, in accordance with article 13 of EU Regulation 2016/679, declares to have read and understood this information notice.