FORGING GROUP MONALE S.r.l.
SEDE AMMINISTRATIVA E OPERATIVA:
Str. Castellero 18/20 – 14013 Monale d'Asti – AT – Italy
SEDE LEGALE:
Via Legnano 26 – 10128 Torino – TO
Tel.: +39 0141 / 669819 – Fax: +39 0141 / 669800
PIVA/CF: 10108770016

CUSTOMER AND SUPPLIER PRIVACY NOTICE

pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR") and Legislative Decree No. 196/2003 (the "Italian Privacy Code"), as amended by Legislative Decree No. 101/2018

Dear Customer, Dear Supplier,

With this document, Forging Group Monale S.r.l. (hereinafter also "F.G.M." or "the Company") explains, in a simple and transparent way, which personal data it processes in the context of its business relationships, why it processes them, on what legal basis, how long it keeps them, to whom they may be disclosed and which rights can be exercised.

1. WHO THIS NOTICE IS ADDRESSED TO

The GDPR protects the data of natural persons and not those of companies as such (Recital 14 GDPR). This notice is therefore addressed to:

- customers and suppliers who are natural persons, such as sole traders and self-employed professionals;
- legal representatives, contact persons, employees and collaborators of customers and suppliers that are companies, whose data F.G.M. processes in order to manage the business relationship (hereinafter, collectively, the "Data Subjects").

We ask customers and suppliers that are companies to bring this notice to the attention of the persons whose data they provide to F.G.M.

2. DATA CONTROLLER

The Data Controller, i.e. the entity that decides why and how the data are processed (Article 4(7) GDPR), is:

- **Forging Group Monale S.r.l.** – VAT No./Tax Code 10108770016
- Registered office: Via Legnano 26, 10128 Turin (TO), Italy
- Administrative and operational headquarters: Str. Castellero 18/20, 14013 Monale d'Asti (AT), Italy
- Tel.: +39 0141 669819 – e-mail for privacy matters: alessandra.madonna@forging-group.com.

3. DATA PROTECTION OFFICER (DPO)

F.G.M. has not appointed a Data Protection Officer (DPO), as the conditions making such an appointment mandatory under Article 37 GDPR do not apply to it. For any matter relating to personal data, you may contact the Data Controller directly using the contact details given in section 2.

4. WHAT DATA WE PROCESS

F.G.M. processes only the data necessary to manage the business relationship (data minimisation principle, Article 5(1)(c) GDPR), such as:

- **identification data**: first name, surname, company role or function;
- **contact data**: e-mail address, telephone number, business address;

- **company and tax details** of the business or professional: company name, VAT number, tax code, registered office;
- **bank and payment data**: bank details (IBAN), payment terms and payment history;
- **data relating to the business relationship**: offers, orders, contracts, transport documents, invoices, correspondence;
- **technical data of electronic communications** exchanged with the Company (e.g. e-mail addresses, date and time of messages);
- for suppliers carrying out work or services at the premises of F.G.M.: names of the staff assigned, training and fitness-for-work certificates required by occupational health and safety legislation (Article 26 of Legislative Decree No. 81/2008).

F.G.M. does not request or process special categories of personal data (Article 9 GDPR) or personal data relating to criminal convictions and offences (Article 10 GDPR) of its customers and suppliers.

5. WHERE THE DATA COME FROM

The data are provided directly by the Data Subject (Article 13 GDPR) or, in the case of contact persons and staff of customers and suppliers, by the company they belong to (Article 14 GDPR), when an offer is requested, an order is placed or a contract is signed, or during the relationship. Some data may be obtained from public sources (e.g. the Companies Register, company websites).

6. WHY WE PROCESS THE DATA, LEGAL BASIS AND RETENTION PERIOD

The GDPR allows personal data to be processed only if there is a valid "legal basis" (Article 6 GDPR). The following table shows, for each purpose, the legal basis applied and the retention period.

Purpose of processing	Legal basis	Retention
A. Management of the business relationship Requests for offers, quotations, orders, contracts, deliveries and shipments, after-sales support, administrative management of customers and suppliers.	Performance of a contract or of pre-contractual measures (Article 6(1)(b) GDPR) For company contact persons: legitimate interest in managing relations with the counterparty (Article 6(1)(f) GDPR)	For the entire duration of the relationship and for **10 years** after its termination (Article 2220 of the Italian Civil Code; ordinary limitation period, Article 2946 of the Italian Civil Code). Offers not followed by a contract: for the period set out in the Data Retention Policy.
B. Legal obligations Accounting and tax obligations (invoicing, keeping of accounting records), occupational health and safety obligations for work contracted out at the Company's premises (Article 26 of Legislative Decree No. 81/2008), requests from the Authorities.	Legal obligation (Article 6(1)(c) GDPR)	**10 years** (Article 2220 of the Italian Civil Code), or any different period laid down by the applicable law.
C. Supplier qualification and assessment Selection, qualification and periodic monitoring of suppliers, including within the framework of the company management systems (e.g. quality, environment, safety).	Legitimate interest in ensuring the quality and reliability of the supply chain (Article 6(1)(f) GDPR)	For the duration of the relationship and for **10 years** after its termination.

Purpose of processing	Legal basis	Retention
D. Internal statistics and customer satisfaction Internal analyses of business performance (on aggregate data) and customer satisfaction surveys by means of questionnaires.	Legitimate interest in improving products and services (Article 6(1)(f) and Recital 47 GDPR)	For the duration of the relationship or until the Data Subject objects. The results are kept in aggregate and anonymous form.
E. Reports of wrongdoing (whistleblowing) Management of reports submitted through the dedicated platform, pursuant to Legislative Decree No. 24/2023 (implementing Directive (EU) 2019/1937), which also protects the staff of customers and suppliers.	Legal obligation (Article 6(1)(c) GDPR)	No longer than **5 years** from the communication of the final outcome of the report (Article 14 of Legislative Decree No. 24/2023).
F. Defence of rights and debt collection Establishment, exercise or defence of a right of the Data Controller in or out of court, including debt collection.	Legitimate interest (Article 6(1)(f) GDPR)	For the duration of the dispute and until the time limits for appeals have expired.

At the end of the periods indicated, the data are deleted or anonymised. Data that have exceeded their retention period are deleted in January of each year, in accordance with F.G.M.'s Data Retention Policy.

7. WHETHER PROVIDING DATA IS MANDATORY

Providing data for purposes A, B and C is necessary: without such data F.G.M. cannot start or continue the business relationship or comply with its legal obligations. The processing described does not require the Data Subject's consent. Taking part in customer satisfaction surveys (purpose D), on the other hand, is optional, and refusing to do so has no consequences for the business relationship.

8. PROCESSING METHODS AND SECURITY MEASURES

The data are processed, in paper and electronic form, only by authorised and trained staff (Article 29 GDPR and Article 2-quaterdecies of the Italian Privacy Code), in compliance with the principles of Article 5 GDPR. Pursuant to Article 32 GDPR, F.G.M. adopts appropriate technical and organisational measures, including:

- access to IT systems through personal credentials and authorisation profiles limited to the tasks performed;
- protection of the company network by means of a firewall;
- a Policy for scheduling and managing company back-ups;
- storage of paper documents in controlled-access archives, reserved exclusively for authorised persons;
- an annual check of the accuracy of the recorded data.

F.G.M. does not use automated decision-making, including profiling, producing legal effects on Data Subjects (Article 22 GDPR).

9. TO WHOM THE DATA MAY BE DISCLOSED

The data are not disseminated. They may be disclosed, only for the purposes stated and to the extent necessary, to the following categories of recipients, who act as data processors appointed by contract (Article 28 GDPR) or as independent data controllers:

- banks, credit and financial institutions, for the management of collections and payments;
- chartered accountant (commercialista), consultants and professional firms assisting the Company in accounting, tax and legal matters;
- forwarding agents, carriers and couriers, for the delivery and collection of goods;
- insurance companies and debt collection agencies;
- providers of IT services and maintenance of company systems;
- certification bodies and auditors, in the context of audits of the company management systems;
- the operator of the whistleblowing platform;
- Authorities, Public Administrations and supervisory and control bodies, for their institutional purposes, as well as third parties for the defence of rights, within the limits provided for by law.

The up-to-date list of data processors may be requested from the Data Controller.

10. TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION

As a rule, the data are processed within the European Union. They may be transferred to non-EU countries where this is necessary to perform the contract with customers or suppliers based in those countries (Article 49(1)(b) and (c) GDPR) or where certain recipients (e.g. IT service providers or forwarding agents) process data outside the EU. In the latter case, data are transferred only to countries covered by an adequacy decision of the European Commission (Article 45 GDPR) or on the basis of appropriate safeguards, such as the Standard Contractual Clauses (Article 46 GDPR). You may ask the Data Controller for information on the safeguards adopted and obtain a copy of them.

11. RIGHTS OF DATA SUBJECTS

The Data Subject may at any time exercise the following rights (Articles 15 to 22 GDPR):

Right	Reference	In practice
Access	Art. 15 GDPR	To know whether we process data concerning him or her and, if so, to obtain a copy of them and to know the purposes, categories of data, recipients, retention period and source.
Rectification	Art. 16 GDPR	To have inaccurate data corrected or incomplete data completed (e.g. a change of contact person or contact details).
Erasure ("right to be forgotten")	Art. 17 GDPR	To have the data deleted, unless retention is necessary to comply with legal obligations or for the defence of legal claims.
Restriction	Art. 18 GDPR	To have the data only stored, without any further use, for example while their accuracy is being verified.
Portability	Art. 20 GDPR	To receive, in a structured, commonly used and machine-readable format, the data provided and processed by automated means on the basis of the contract, and to transmit them to another controller.

Right	Reference	In practice
Objection	Art. 21 GDPR	To object, on grounds relating to his or her particular situation, to processing based on legitimate interest (purpose A for contact persons, and purposes C, D and F), unless the Data Controller demonstrates compelling legitimate grounds or the need to defend legal claims.
Automated decisions	Art. 22 GDPR	Not to be subject to decisions based solely on automated processing. F.G.M. does not carry out such processing.
Complaint	Art. 77 GDPR	To lodge a complaint with the Italian Data Protection Authority – Garante per la protezione dei dati personali (Piazza Venezia 11, 00187 Rome, Italy – www.garanteprivacy.it) or with the supervisory authority of the EU Member State in which he or she lives or works.

The Data Controller will notify each recipient of any rectification, erasure or restriction, unless this proves impossible or involves disproportionate effort (Article 19 GDPR).

12. HOW TO EXERCISE YOUR RIGHTS

Requests can be sent:

- by e-mail to: alessandra.madonna@forging-group.com;
- or by registered letter with return receipt to: Forging Group Monale S.r.l., Str. Castellero 18/20, 14013 Monale d'Asti (AT), Italy.

The Data Controller will reply **within one month** of receipt of the request; this period may be extended by **two further months** where requests are complex or numerous, in which case the requester will be informed within the first month (Article 12(3) GDPR). Exercising these rights is **free of charge**; only where requests are manifestly unfounded or excessive, in particular because of their repetitive character, may the Data Controller charge a reasonable fee or refuse to act on the request (Article 12(5) GDPR). To protect the data, the Data Controller may ask for information needed to confirm the requester's identity (Article 12(6) GDPR).

13. UPDATES TO THIS NOTICE

This notice replaces all previous versions and may be updated in the event of regulatory or organisational changes. The updated version is always available from the Data Controller on request.

Monale d'Asti, 8 October 2026

The Data Controller
Forging Group Monale S.r.l.