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

WEBSITE PRIVACY NOTICE

pursuant to Article 13 of Regulation (EU) 2016/679 ("GDPR"), Article 122 of Legislative Decree No. 196/2003 (the "Italian Privacy Code") and the Guidelines on cookies issued by the Italian Data Protection Authority (the "Garante") on 10 June 2021

Dear User,

With this document, Forging Group Monale S.r.l. (hereinafter also "F.G.M." or "the Company") explains to you, in a simple and transparent way, which personal data are processed when you visit the website www.forging-group.com (in all its language versions) or contact us through the website, why they are processed, how long they are kept and which rights you can exercise. The document also describes the use of cookies.

This notice applies only to this website and not to other websites, pages or online services that can be reached through external links, for which please refer to their respective privacy notices (see section 10).

1. DATA CONTROLLER

The Data Controller, i.e. the entity that decides why and how your 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 – Certified e-mail (PEC): forging-group@legalmail.it
- E-mail for privacy matters: alessandra.madonna@forging-group.com.

2. 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 your data, you may contact the Data Controller directly using the contact details given in section 1.

3. WHAT DATA WE PROCESS

a) Browsing data. The IT systems and software that run the website acquire, during their normal operation, certain data whose transmission is implicit in the use of Internet communication protocols. These include, for example: the IP address or domain name of the device used, the addresses (URLs) of the pages requested, the time of the request, the method used to submit it to the server, the size of the file obtained in response, the code indicating the outcome of the response (successful, error, etc.) and other parameters relating to the user's operating system and browser. These data are not collected in order to identify the user, but could make it possible to do so if combined with other information.

b) Data voluntarily provided by the user. If you fill in the "Contact us" form or write to the e-mail and PEC addresses shown on the website, F.G.M. acquires the contact data needed to

reply to you (e.g. first name, surname, company, e-mail address, telephone number) and any other personal data included in your message. We kindly ask you not to include unnecessary data, in particular special categories of personal data (Article 9 GDPR), such as health data.

c) Cookies. Information on the cookies used by the website is provided in section 5.

4. 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. Operation and security of the website Enabling browsing, checking that the website is working properly and detecting any anomalies, misuse or cyber attacks.	Legitimate interest in ensuring the operation and security of the website (Article 6(1)(f) and Recital 49 GDPR)	Browsing data: **7 days**, unless needed by the judicial authorities to investigate criminal offences.
B. Website usage statistics Producing aggregate statistics (e.g. number of visitors, most visited pages, geographical areas of origin).	Legitimate interest in improving the website (Article 6(1)(f) GDPR) The data are processed in aggregate and anonymous form	Statistics are kept only in aggregate and anonymous form.
C. Replying to contact requests Handling requests sent through the "Contact us" form or to the e-mail/PEC addresses (e.g. requests for information or quotations).	Performance of pre-contractual measures at the request of the data subject (Article 6(1)(b) GDPR) Legitimate interest in replying to the requests received (Article 6(1)(f) GDPR)	For the time needed to deal with the request and in any case no longer than **12 months** from the last contact. If a business relationship arises, the Customer and Supplier Privacy Notice applies.
D. Legal obligations and requests from the Authorities Compliance with obligations laid down by laws, regulations or EU legislation, or imposed by the Authorities.	Legal obligation (Article 6(1)(c) GDPR)	For the period laid down by law or by the Authority's request.
E. Defence of rights in court Establishment, exercise or defence of a right of the Data Controller in court.	Legitimate interest (Article 6(1)(f) GDPR)	For the duration of the dispute and until the time limits for appeals have expired.

Your consent is not required for any of the purposes indicated. To send a request through the "Contact us" form, it is sufficient to declare that you have read this notice.

5. COOKIES

Cookies are small text files that the website sends to your device while you are browsing and that are read on subsequent visits. Pursuant to Article 122 of the Italian Privacy Code and the Garante's Guidelines of 10 June 2021, cookies are divided into:

- **technical cookies**: necessary for the operation of the website or to provide a service requested by the user. They do not require consent;
- **analytics cookies**: used to collect statistics on the use of the website. They are treated as technical cookies, and therefore do not require consent, only if they collect data in aggregate

form and with tools that reduce the ability to identify the user (e.g. masking part of the IP address);

- **profiling cookies**: used to create user profiles and send targeted advertising. They always require prior consent.

The F.G.M. website uses only technical session cookies, strictly necessary for secure and efficient browsing, which are deleted when the browser is closed, and possibly analytics cookies with the characteristics described above, to produce aggregate statistics. The website **does not use profiling cookies** or other tracking tools. For this reason, no banner is displayed to collect consent.

You can in any case manage or delete cookies at any time from your browser settings (usually in the "Privacy" or "Security" section). Disabling technical cookies may prevent some parts of the website from working properly.

6. WHETHER PROVIDING DATA IS MANDATORY

Apart from browsing data, which are essential for the operation of the website, providing your data is free and optional. However, if you do not provide the contact data requested in the "Contact us" form, F.G.M. will not be able to reply to your request.

7. PROCESSING METHODS AND SECURITY MEASURES

The data are processed by electronic means, 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 and with appropriate technical and organisational measures pursuant to Article 32 GDPR, including encryption of communications between your browser and the website (HTTPS protocol) and access to systems through personal credentials. F.G.M. does not use automated decision-making, including profiling (Article 22 GDPR).

8. 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:

- the hosting service provider and the parties in charge of managing and maintaining the website;
- providers of IT and e-mail services;
- legal advisers, for the resolution of any legal and contractual issues;
- 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.

9. TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION

The data collected through the website are processed within the European Union. Should any providers process them in non-EU countries, data will be 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), and this notice will be updated.

10. EXTERNAL LINKS AND WHISTLEBLOWING PLATFORM

The website may contain links to third-party websites or services. In particular, the "Whistleblowing" page links to the external platform used for reporting wrongdoing pursuant to Legislative Decree No. 24/2023 (implementing Directive (EU) 2019/1937): the processing of data relating to reports is described in the specific Whistleblowing Privacy Notice, published on the same page. F.G.M. is not responsible for processing carried out by third-party websites, for which please refer to their respective privacy notices.

11. YOUR RIGHTS

You 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 your data and, if so, to obtain a copy of them and to know the purposes, categories of data, recipients and retention period.
Rectification	Art. 16 GDPR	To have inaccurate data corrected or incomplete data completed.
Erasure ("right to be forgotten")	Art. 17 GDPR	To have your data deleted, unless retention is necessary to comply with legal obligations or for the defence of legal claims.
Restriction	Art. 18 GDPR	To have your data only stored, without any further use, for example while their accuracy is being verified or while your objection is being assessed.
Portability	Art. 20 GDPR	To receive, in a structured, commonly used and machine-readable format, the data you have provided through the contact form, and to transmit them to another controller.
Objection	Art. 21 GDPR	To object, on grounds relating to your particular situation, to processing based on legitimate interest (purposes A, B, C and E), 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 you live or work.

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

You can send your request:

- by e-mail to: alessandra.madonna@forging-group.com;
- by certified e-mail (PEC) to: **forging-group@legalmail.it**;
- 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 you will be informed within the first month (Article 12(3) GDPR). Exercising your 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 your data, the Data Controller may ask you for information needed to confirm your 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 or changes to the website. The version in force is always published on this page, together with the date of the last update.

Monale d'Asti, 8 October 2026

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