

## INFORMATION ON THE PROCESSING OF PERSONAL DATA

Pursuant to Regulation (EU) 2016/679 ("GDPR"), Reiwa S.r.l. ("**Company**" or the "**Owner**") provides below the information regarding the processing of your personal data when you use the services of the website reiwaengine.com ("**Website**").

### 1. Identity and contact details of the Data Controller

The Data Controller is Reiwa S.r.l., with registered office in Via G. Pitrè, 6B, 95041, Caltagirone (CT), which can be contacted by means of the following email address: [info@reiwaengine.com](mailto:info@reiwaengine.com).

### 2. Contact details of the Data Protection Officer

The Company has appointed a Data Protection Officer, who can be contacted at the following email address: [info@reiwaengine.com](mailto:info@reiwaengine.com).

### 3. Purpose of processing and legal basis of processing

#### a) *Necessary legal and contractual purposes - processing necessary to fulfil a contractual or legal obligation to which the controller is subject or to execute a specific request of the data subject*

Your personal data may be processed, without the need for your consent, in cases where this is necessary to comply with obligations arising from legal provisions, as well as from standards, codes or procedures approved by Authorities and other competent Institutions.

Your personal data will also be processed for purposes relating to and/or connected with the provision of services by the Company in the context of browsing the Website, such as specifically:

- for the provision of the Services requested by the user including the collection, storage and processing of data for the purpose of establishing and subsequent operational and technical management;
- for the provision of the Services requested by the customer with the registration to the Website including the collection, storage and processing of data for the purpose of establishment and subsequent operational management, the technical and administrative relationship related to the provision of the Services and the making of communications relating to the performance of the Services;
- for the management of relations with public authorities and third parties for purposes related to particular requests, to the fulfilment of legal obligations or to particular procedures.

These data - the provision of which is necessary for the operational execution of the Services - will also be processed by electronic means, recorded in special databases, and used strictly and exclusively in the context of navigation on the Website.

#### b) *Commercial and marketing purposes - consent*

Your personal data may also be processed, subject to your consent, for the following additional purposes functional to the activity of the Data Controller or of a third party:

- market research, economic analysis and statistics;
- marketing the services of the Data Controller and/or of a third party, sending advertising/informative/promotional material;
- customer satisfaction surveys on the quality of the services provided.

These activities may concern the products and services of the Data Controller, as well as those of its business partners, and may also be carried out by means of an automated call system, without the intervention of an operator, including e-mail, telefax and SMS (Short Message Service) messages.

Consent to the processing of data and communication to the subjects listed below for the aforementioned purposes is optional and may be revoked by writing to the following email address: [info@reiwaengine.com](mailto:info@reiwaengine.com).

#### c) *Defence of a right in court*

In addition, your personal data will be processed whenever necessary in order to establish, exercise or defend a right of the Controller in court.

d) *Legitimate interest of the Data Controller*

The Data Controller may process your personal data, without your consent, in the following cases:

- in the case of extraordinary transactions involving the merger, transfer or transfer of business units, in order to enable the operations necessary for the due diligence and prodromiche activities to be carried out. It is understood that exclusively necessary data will be processed for the aforementioned purposes, in aggregate/anonymous form as much as possible;
- anonymous and aggregate analysis of the use of the services used, to identify user habits and propensities, to improve the services provided and to meet specific user needs, or the preparation of initiatives related to the improvement of the services provided.

#### 4. Recipients of personal data

For the pursuit of the purposes indicated in point 3, the Data Controller may communicate your personal data to third parties, such as, for example, those belonging to the following subjects or categories of subjects:

- police forces, armed forces and other public administrations, for the fulfilment of obligations under law, regulations or Community legislation. In such cases, according to the applicable legislation on data protection, the obligation to obtain the prior consent of the data subject to such communications is excluded;
- companies, entities or associations, or parent, controlled or affiliated companies within the meaning of Article 2359 of the Civil Code, or between them and companies under common control, as well as between consortia, networks of undertakings and temporary groupings and associations of undertakings and with their members, limited to communications made for administrative and/or accounting purposes;
- companies specialising in the management of commercial or credit information or advertising;
- other companies contractually linked to the Data Controller that carry out, for example, consultancy activities, support for the provision of services etc..

The Data Controller guarantees the utmost care so that the communication of your personal data to the aforementioned recipients concerns only the data necessary to achieve the specific purposes for which they are intended.

Your personal data are stored in the Data Controller's databases and will be processed exclusively by authorized personnel. The latter will be provided with appropriate instructions on the methods and purposes of processing. These data will also not be disclosed to third parties, except as provided above and, in any case, within the limits indicated therein.

Finally, we remind you that your personal data will not be disseminated, except in the cases described above and/or provided for by law.

#### 5. Data retention period

The data will be kept for a period of time no longer than necessary for the purposes for which they were collected or subsequently processed in accordance with the provisions of the law.

#### 6. Rights of data subjects

As a data subject, you are granted the following rights to the personal data collected and processed by the Data Controller for the purposes indicated in point 3: (i) the right of access, in particular by requesting, at any time, confirmation of the existence of your personal data in the Company's archives and the provision of such information in a clear and intelligible manner, as well as the right to know the origin, logic and purpose of the processing with express and specific indication of the persons in charge and responsible for the processing and third parties to whom your data may be communicated; (ii) the right to obtain the updating and rectification of your data (except for evaluation data), the deletion of superfluous data or its transformation into anonymous form, as well as the blocking of processing and definitive deletion in the event of unlawful processing; and (iii) where applicable, the restriction of processing and the portability of your data. The law also gives you the right to lodge a complaint with the Garante per la protezione dei dati personali (Guarantor for the protection of personal data), should you discover a violation of your rights under the applicable data protection legislation.

You can exercise the rights listed above by writing to the Data Protection Officer at [info@reiwaengine.com](mailto:info@reiwaengine.com).

#### 7. **Transfer of data abroad**

As part of the purposes described in this statement, Reiwa S.r.l. does not transmit the Data provided to companies, bodies or international organizations with offices in countries outside the territory of the European Union.

#### 8. **Amendments to this Policy**

Reiwa S.r.l. may make changes to this policy, ensuring in any case the timely update of this website and allowing access to the various versions that have occurred over time, available at the same address.

