

Data Protection Statements

We are hereby informing you about the processing of your personal data by Italbras Spa and your rights in accordance with the new data protection law.

1. PARTY RESPONSIBLE FOR THE DATA PROCESSING

Italbras Spa
Strada del Balsego 6
636100 Vicenza
Italy
Tel.: 0039 0444 347500
Fax: 0039 0444 347501
E-mail: dataprotection@italbras.it

The contact details of our data protection officer are:

Italbras Spa
Data Protection Officer
Strada del Balsego 6
636100 Vicenza
Italy
E-mail: dataprotection@italbras.it

2. PERSONAL DATA SOURCES

We process personal data that we receive from our customers and interested parties during the course of our business relationship.

To render our service we also process, where appropriate, personal data that we obtain in a permissible manner from sources that are available to the general public (e.g. the internet, commercial registers or credit rating data) or which are lawfully forwarded to us by other companies of the SAXONIA Group.

These may be personal data such as names, addresses, contact data, activity descriptions, birth dates and places, citizenship, legitimation data (e.g. identification paper or passport data) and authentication data (e.g. signature samples). These may also be data resulting from compliance with our contractual obligation (including sales data and payment transaction data), information about the financial situation (credit rating data, scoring data and asset data), know your customer data of the company (e.g. visiting reports) as well as other data that are comparable with the stated categories.

In the case of establishing contact with us by e-mail or via a contact form on our website, we shall save your details to reply to your question(s). Such data are saved solely for the purpose of replying to your enquiry.

3. PURPOSE OF PROCESSING / LEGAL BASIS

We process your personal data on the basis of the provisions of the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG), as well as all other applicable laws.

3.1 Consent (Article 6(1a) GDPR)

Where you have consented to us processing personal data for certain purposes, the lawfulness of such processing is given on the basis of your consent. Consent that is granted may be withdrawn at any time. This also applies to withdrawing declarations of consent you issued before the GDPR came into force.

Please note that such a withdrawal only applies to processing in the future. This does not affect processing that applied prior to the withdrawal.

3.2 On complying with contractual obligations (Article 6(1b) GDPR)

Data are processed for product manufacture, commercial services and transport services etc. as part of executing our contracts with our customers or to perform pre-contractual measures on request. The data processing purposes are related towards a specific product or a specific service, and include pre-contractual measures such as offers, information, consulting and analyses etc.

3.3 As a result of compliance with legal obligations (Article 6(1c) GDPR)

We are subject to various legal obligations and statutory requirements (e.g. commercial and tax law storage requirements in accordance with the German Commercial Code and the German Tax Code). The processing purposes include a credit rating review, establishing an identity (legitimation of a contracting party, its beneficial owner and the persons acting on behalf of the contracting party), preventing fraud and money laundering as well as embargo reviews. Furthermore, the processing purposes include honouring tax law controlling obligations, reporting obligations as well as monitoring and controlling risks at the company and within the SAXONIA Group.

3.4 As part of legitimate interests (Article 6(1f) GDPR)

Where necessary, we process your data beyond the execution of the contract to safeguard legitimate interests on our part or those of third parties. Examples:

- Legal claims and defence in the case of legal disputes
- Measures for safeguarding owners' rights
- Prevention and clarification of criminal offences
- Measures involving building and plant security (e.g. access controls or video surveillance) Video surveillance is aimed at property security and criminal prosecution. They are aimed at protecting our customers and employees as well as their and our valuable items (.e.g. robbery and fraud).
- Guaranteeing IT security and IT operations
- Measures involving business management and further developing services and products including customer and supplier assessments
- Advertising or market and opinion research where you have not objected to the use of your data
- Review and optimisation of procedures and processes
- Consultation of information bureaus and credit insurers to determine and secure credit and default risks
- Risk management in the SAXONIA Group

4. FORWARDING DATA TO THIRD PARTIES

We only forward your data to third parties if this is necessary to honour our contractual and statutory obligations.

The service providers carefully selected for these processes and services have their principal place of business within the EU and operate in compliance with the EU General Data Protection Regulation.

Categories of recipients of the personal data

4.1. Data processing in the SAXONIA Group

Central divisions of our Group perform certain data processing tasks for the companies affiliated in the Group. Where a contractual or pre-contractual relationship exists with one or more companies of our Group, your data may be processed by a Group company for example to prepare an offer, review customer acceptance, process contracts and performance or assess risk. Companies of the SAXONIA Group are:

Companies of the SAXONIA Group are:	Principal place of business
SAXONIA Edelmetalle GmbH	Halsbrücke, Germany
SAXONIA Technical Materials GmbH	Hanau, Germany
Wieland Edelmetalle GmbH	Pforzheim, Germany
Italbras Spa	Vicenza, Italy

4.2. External service providers

We call, in part, on the services of external service providers to fulfill our contractual and statutory obligations. The following service providers render services for the companies of the SAXONIA Group:

Service providers	Order processing in accordance with
File and data shredders	Archiving and destroying files and data carriers/storage media
Forwarding agents, post and parcel services	Shipping and collection of goods and post
IT service providers	Maintenance and support for the used data processing programmes
Credit insurers	Credit insurance
Collection companies	collection of receivables
Lawyers	Legal services
Economic credit agencies	Obtaining information
Insurance of any kind	Employees personal data
Recruitment agencies	Candidates personal data

4.3. Public bodies and institutions

These are, for example, fiscal authorities in the event that a statutory, judicial or official obligation applies or an order to fulfill our statutory obligations to provide information.

4.4. Additional recipients

Additional data recipients may be the bodies for which you have granted us your consent for the forwarding of data.

5. DATA FORWARDING TO BODIES IN STATES OUTSIDE THE EUROPEAN UNION (THIRD COUNTRY)

Personal data are only forwarded to bodies in countries outside the European Union (so-called third countries) where this is required to perform your orders (e.g. payment orders, transport orders for deliveries and collections, transfer orders), where such action is specified by law or if you have granted us your consent in that respect.

6. PERIOD IN WHICH DATA ARE STORED

We process and save your personal data as long as such action is required to honour our contractual and statutory obligations. In that respect please note that our business relationship may be a business relationship geared towards a permanent period (e.g. managing precious metal accounts).

If the data are no longer required to fulfill contractual or statutory obligations (e.g. statutory storage obligations), such data shall be deleted. The statutory storage obligations that are based on commercial and tax requirements are, among other things, geared towards the requirements set out in the German Commercial Code (HGB) and the German Tax Code (AO).

7. RIGHTS OF THE DATA SUBJECT

7.1. Right to object

You are entitled to object to the processing of your personal data. We process your data to safeguard justified interests. You may object to such processing for reasons that arise from your special situation.

In this respect please sent us an e-mail to dataprotection@italbras.it

7.2. Right to obtain information

You are entitled to obtain information about your personal data that we save. In this respect please sent us an e-mail to dataprotection@italbras.it

7.3. Deletion / correction right

You are entitled to the correction of inaccurate data, the blocking of your data, transfer of your data and deletion of your personal data.

In this respect please sent us an e-mail to dataprotection@italbras.it

7.4. Right to complain

You are entitled to lodge a complaint with our data protection officer or the data protection supervisory authority.

7.5. Withdrawing consent

Where you have granted consent, you are entitled to withdraw such consent at any time. This does not affect the lawfulness of the processing that occurs based on the granted consent up until the withdrawal.

We are pleased that you are visiting our website and about your interest in our products and our company.

Data processing on this website

We collect and store several items of information that are usually transmitted by the browser in order to further improve our internet offers, insofar as your browser makes these available. These data cannot be allocated to certain persons for us as the operator of the website. These data will not be aggregated with other data sources.

Use of cookies

This website uses “**cookies**” (small text files), which are placed on your computer and which are stored by your browser. These cookies serve to make our website more user-friendly and more secure. If you wish you can delete the cookies again at all times. This can, however, lead to the fact that individual functions are no longer available to you. With regard to the deletion of the cookies please inform yourself in the help function of your browser.

Use of the web analysis tool Google Analytics as well as of Google Maps

This website uses **Google Analytics**, a web analysis service of Google Inc. (“Google”). Google Analytics uses cookies which are stored on your computer and which enable an analysis of the use of the website. Google will use this information in order to evaluate the use of the website in order to compile reports about the website activities for the website operator and in order to provide further services associated with the website use and the internet use. Google can also, if applicable transmit this information to third parties if this is stipulated by law or insofar as third parties process these data by order of Google. You can prevent the installation of the cookies by a corresponding setting of your browser software.

The use of **Google Maps** on our website serves the interest of a corresponding presentation of our online offer and in order to facilitate locating us.

Should you have a customer account with Google and be logged-in your surfing behaviour can be directly allocated to your personal profile. By logging out beforehand you have the possibility to prevent this.

You can find more information relating to the handling of user data in the privacy statement of Google: <https://policies.google.com/privacy?hl=en&gl=en>