

PRIVACY NOTICE FOR CUSTOMERS AND PROSPECTS OF CRIPPACAMPEGGIO S.R.L.

Crippacampeggio S.r.l. a Socio Unico (*hereinafter the “Company” or “Crippacampeggio”*) issues this notice pursuant to Article 13 of EU Regulation 2016/679 (“GDPR”), in compliance with the principles of fairness, lawfulness, transparency and confidentiality, subject to modifications and adjustments required following national or EU regulatory interventions or Supervisory Authority decisions issued after its publication.

1. Data Controller

The Data Controller is “Crippacampeggio S.r.l. a Socio unico” – Corso Europa 12 – 20122 Milano (MI).

2. Origin of personal data

The personal data collected and processed are provided by the Customer at the time of sale. Prospect data are collected during the pre-contractual phase, when an offer is requested.

3. Nature of the processed data

The processing concerns common personal data such as, by way of example and without limitation: company/personal details, tax code/VAT number, telephone number, email address, IBAN.

4. Purposes of processing

Personal data are collected and processed for the following purposes:

- a) pre-contractual purposes:** to respond to requests submitted by the Prospect and/or Customer and for any activity instrumental to the subscription and/or activation of the services offered by Crippacampeggio;
- b) contractual purposes:** for the sale of products and services, including support or ancillary services requested by the Customer; for technical, administrative and accounting management of claims and disputes; for sending service information and communications;
- c) compliance with obligations under EU and national regulations,** including laws, regulations *pro tempore* in force and measures issued by authorised authorities, as well as for purposes connected to crime prevention and prosecution;
- d) purposes connected to the contract:** to proceed with the sale of products or services, certain personal data obtained from public registers (e.g., protests, prejudicial registrations such as attachments, insolvency procedures, seizures, mortgages, judicial applications), as well as corporate or financial records, may be used. Such data are acquired through access to authorised information systems and processed only when necessary for assessing payment reliability. The Company may also process information on the Customer’s payment timeliness for the protection of credit rights;
- e) direct marketing purposes:** for sending advertising material or commercial communications relating to products and/or services offered by the Company, which may be sent—with prior explicit consent—to both Customers and Prospects.



5. Methods and logic of processing

The processing of personal data is carried out by Crippacampeggio, both through the use of manual tools and with the support of electronic and automated means. The data processing will be performed using organizational and data-management procedures consistent with the purposes set out in this privacy notice, and in any case in such a way as to ensure the security and confidentiality of the data. More specifically, the data will be stored on servers protected against theft or alteration through dedicated archiving systems and IT security measures.

6. Retention periods

The personal data will be processed by Crippacampeggio for the entire duration of the contractual relationship and also thereafter, for the purpose of enforcing or protecting its rights. Such data may also be processed by Crippacampeggio for a maximum period of 24 months for the purposes referred to in point 3, letter (e), against which the Client/Prospect may object at any time using the methods indicated in point 10. After the termination of the signed contract, the data may be processed exclusively for administrative and/or legal purposes (e.g., in the event of unlawful acts such as fines, damages, thefts, etc.) and for the fulfilment of obligations deriving from the regulatory framework.

7. Categories of entities to whom the data may be communicated

For the above-mentioned purposes, data may be communicated in Italy to:

- (a) Public authorities and supervisory or regulatory bodies when required by specific legislative, regulatory or authorisation provisions;
- (b) Entities that carry out, on behalf of Crippacampeggio, technical or organisational tasks; entities providing support or services instrumental to the execution of the contract; entities providing data acquisition, processing and elaboration services necessary for the provision of services to customers; entities performing archiving and data-entry activities; firms and companies within the scope of assistance and consultancy relationships, including legal advice; entities carrying out control, audit and certification activities relating to the operations performed by Crippacampeggio, also in the interest of its Customers and users; factoring companies, credit or banking institutions and credit-card issuing companies; insurance companies.
- (c) External companies operating in the credit-recovery sector, including payment-extension services, where permitted by applicable legislation, for the purposes of preventing and controlling insolvency risk, fraud monitoring and credit protection, and appointed as external Data Processors for this purpose.

These subjects act as Independent Data Controllers or as external Processors appointed by the Company.

The list of External Processors is available at the Company's registered office upon request.

All employees, consultants and collaborators operating under Company instructions are designated as authorised persons. Crippacampeggio provides them with adequate operational guidelines, especially on security measures.

8. Nature of consent and legal basis

The provision of personal data by the Client is necessary for the conclusion and performance of the contractual relationship, to comply with legal obligations, or for reasons of legitimate interest as specified in the purposes described in point 3, letters a),

Crippacampeggio S.r.l. a socio unico

www.crippacampeggio.it - info@crippacampeggio.it



Sede legale Corso Europa n. 12 - 20122 Milano
Sede amm.va Via del Dosso 9 20841 Carate Brianza (MB)
Tel. 0362/901988 - Fax 0362/991103
Codice fiscale 02543210153
Partiva IVA 00735590960

Società soggetta a direzione e coordinamento della
società Oikos S.r.l



b), c) and d) (in accordance with Art. 6, letters b), c) and f) of the GDPR). Any refusal would make it impossible for Crippacampeggio, to proceed with the performance of the signed contract.

With regard to the processing purpose referred to in point 3, letter e) of this Privacy Notice, consent to the processing of data by the Client/Prospect is optional and may be withdrawn at any time.

Crippacampeggio may send the Client/Prospect commercial communications relating to products and/or services similar to those already provided, using the email contact details supplied on such occasions, to which the Client/Prospect may object at any time using the methods indicated in point 10.

9. Further information

Updates to this Privacy Notice will be made available on the website and through Company communication channels.

10. Data Subject Rights

Pursuant to Articles 15 et seq. of EU Regulation 2016/679, the data subject is granted the right to exercise specific rights towards us. In particular, the data subject may:

- obtain confirmation of the existence of personal data concerning him/her, even if not yet recorded, access such data and their origin, as well as the purposes, retention periods, processing methods, and the logic applied in the event of processing carried out by automated means;
- withdraw any consent previously given for processing for marketing purposes, without affecting the lawfulness of processing carried out prior to such withdrawal;
- receive the personal data provided, in a structured, commonly used and machine-readable format, and, where technically feasible, have such data transmitted directly to another Data Controller;
- obtain the erasure, anonymisation or restriction of data whose retention is not necessary in relation to the purposes for which they were collected and processed;
- obtain the updating, rectification and integration of the processed data;
- object, in whole or in part, on legitimate grounds, to the processing of personal data concerning him/her, even if relevant to the purpose of the collection;
- lodge a complaint with the Supervisory Authorities.

The exercise of these rights must not prejudice or infringe the rights and freedoms of others.

You may exercise these rights at any time by writing via postal mail to Crippacampeggio, Corso Europa 12, 20122 Milano (MI) or by contacting the following email address: privacy@crippacampeggio.it.

If requests are submitted by electronic means, the information will be provided free of charge and in a commonly used electronic format.

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Where the data subject's requests are manifestly unfounded or excessive, in particular due to their repetitive nature, the Company may alternatively: charge a reasonable fee taking into account the administrative costs incurred to provide the information or communication or to take the requested action; or refuse to act on the request. In both cases, the Company will provide the data subject with an appropriate justification.

The data subject, pursuant to Article 13 of EU Regulation 2016/679, declares that he/she has read and understood this privacy notice.

In addition, he/she gives consent to the processing of personal data for the sending of commercial communications for marketing purposes, as indicated in point 3, letter (e) of this order form.

11. Transfer of personal data to third countries

The personal data collected by Crippacampeggio are processed primarily within the European Economic Area (EEA). Should the data need to be transferred to countries outside the EEA for technical, organizational, or operational reasons, such transfer will occur in accordance with Articles 44 et seq. of Regulation (EU) 2016/679. In particular, the transfer will take place only to Third Countries that ensure an adequate level of protection for personal data, as recognized by an adequacy decision of the European Commission, or on the basis of appropriate safeguards, such as the Standard Contractual Clauses approved by the Commission, or with the explicit consent of the data subject.

Further information regarding the data transfer and the safeguards adopted may be requested by writing to: privacy@crippacampeggio.it.

Last revision: May 2026

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