



PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

Customers, prospective customers and their contacts - Articles 13 and 14 of Regulation (EU) 2016/679

Version 3.0 - updated on 29 September 2026

This Privacy Notice describes the processing of personal data carried out by Tubi Italflex S.r.l. Società Benefit in connection with relationships with customers, prospective customers and natural persons acting on their behalf. It is provided pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (the "GDPR") and Legislative Decree No. 196 of 30 June 2003, as subsequently amended and supplemented (the "Italian Privacy Code").

1. Data Controller

Data Controller: Tubi Italflex S.r.l. Società Benefit, VAT No./Tax Code 00755040151, with registered office and production site at Via Monte Nero 31/37, 20008 Bareggio (MI), Italy. Privacy contact: privacy@tubi-italflex.it General contact: info@tubitalflex.com.

2. Data Subjects and Scope

This Privacy Notice applies to natural persons whose personal data are processed in connection with existing or prospective business relationships, including customers who are natural persons, sole traders and professionals, as well as legal representatives, attorneys-in-fact, employees, collaborators, and technical, administrative, logistics or commercial contacts of customer or prospective customer companies and entities. The GDPR does not apply to data relating exclusively to legal persons, but it does apply to the personal data of natural persons acting on their behalf.

3. Categories of Personal Data Processed

- identification and personal data: first name, surname, title, role, tax identification number and, where necessary, strictly relevant identification details;
- professional contact details: address, e-mail, certified e-mail (PEC), telephone number and other contact details;
- administrative, tax, accounting and banking data necessary for managing the relationship;
- data relating to the organisation to which the data subject belongs, position held, signing powers, authorisations and professional qualifications, where relevant;
- data contained in correspondence and in commercial and technical documentation, such as requests for quotation, orders, contracts, order confirmations, invoices, transport documents, complaints and support requests;
- any data necessary for the protection of rights, the handling of disputes or compliance with specific statutory obligations.

Special categories of data and data relating to criminal convictions and offences. As a rule, Tubi Italflex does not request special categories of personal data within the meaning of Article 9 GDPR, nor data referred to in Article 10 GDPR. Where such data are exceptionally necessary, they will be processed only where an appropriate legal basis exists and strictly to the extent necessary.

4. Sources of Personal Data and Information under Article 14 GDPR

Personal data may be collected directly from the data subject or, where necessary, from the organisation on whose behalf the data subject acts, companies within the same group or supply chain, business partners involved in the relationship, public registers and lists, Chambers of Commerce, public authorities, professional registers, institutional or professional websites and other lawfully accessible sources.

Where personal data have not been obtained directly from the data subject, this Privacy Notice is provided within the time limits laid down in Article 14(3) GDPR: within a reasonable period and in any event no later than one month after obtaining the data; at the latest at the time of the first communication with the data subject, where the data are to be used for such communication; or, where disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.

This Privacy Notice may be provided directly in electronic format, including as an attachment to a communication, or in paper format or by any other suitable means ensuring clarity and accessibility. Further information and an up-to-date copy of this Privacy Notice may be requested from the privacy contact indicated in Section 1.



5. Purposes, Legal Bases and Nature of the Provision of Data

Purpose	Legal basis	Provision of data	Consequences of failure to provide data
Management of enquiries, quotations, offers, negotiations, orders, contracts, deliveries, support and related operational communications.	Article 6(1)(b) GDPR, where the data subject is a party to the contract or requests steps to be taken prior to entering into a contract.	Necessary for data essential to the relationship.	Inability to initiate or continue the relationship, insofar as the data are necessary.
Management of the contacts and representatives of customer companies or entities; organisation and continuity of an existing B2B business relationship.	Article 6(1)(f) GDPR - legitimate interests pursued by the Controller in properly managing the B2B relationship, subject to an assessment of necessity and balancing of interests.	As a rule, necessary for the ordinary management of the relationship.	Possible limitations in managing the relationship, without prejudice to the right to object in the cases provided for by Article 21 GDPR.
Sending by e-mail company presentations, information on products or services, and other commercial or promotional communications to prospective new customers or their contacts, where the communication has not been requested by the recipient.	Articles 6(1)(a) and 7 GDPR, based on prior, freely given, specific, informed and demonstrable consent, in compliance with Article 130(2) of Legislative Decree No. 196/2003. Legitimate interests under Article 6(1)(f) GDPR do not replace the consent required by the specific rules governing electronic communications.	Optional. Consent must be obtained before the communication is sent and the Controller must be able to demonstrate that it was obtained.	In the absence of consent, promotional e-mails will not be sent, except where the specific "soft spam" exemption under Article 130(4) applies.
Sending by e-mail to existing customers communications concerning products or services similar to those previously purchased (so-called "soft spam").	Article 130(4) of Legislative Decree No. 196/2003 - specific exemption from prior consent for the e-mail channel only, applicable exclusively where the address was collected in the context of a sale actually completed and the communication concerns similar products or services. It does not constitute a general application of the legitimate interests legal basis.	No new consent is required only if all statutory conditions are met.	The recipient must be able to refuse such communications when the e-mail address is collected and in each subsequent communication, free of charge and by simple means; communications cease following objection.
Administrative, accounting, tax, corporate, security and other compliance obligations arising from laws, regulations, measures or orders of competent authorities.	Article 6(1)(c) GDPR - compliance with a legal obligation.	Mandatory where required by applicable law.	Inability to comply properly with the relevant obligations or to continue the relationship where the data are necessary.
Prevention of abuse or fraud; handling of complaints and disputes; establishment, exercise or defence of legal claims.	Article 6(1)(f) GDPR - legitimate interests pursued by the Controller, insofar as the processing is necessary and proportionate.	As a rule, necessary to protect the relationship and the Controller's rights.	Possible limitations in handling the matter or protecting legal rights.

Consent and promotional e-mails. Consent is not required for processing based on a contract or on pre-contractual steps requested by the data subject, compliance with legal obligations or legitimate interests where permitted. By contrast, unsolicited promotional e-mails are subject to the specific rules set out in Article 130 of the Italian Privacy Code: as a rule, sending such communications to prospective customers or their contacts requires prior, valid and demonstrable consent. The mere publication of an e-mail address on websites, social networks, registers, professional directories, certified e-mail (PEC) directories or professional databases does not make the sending of promotional e-mails lawful. Consent must be capable of being withdrawn at any time by simple means.

Company presentation and B2B commercial contact. If the company presentation is sent in response to an express request from the recipient or in the context of negotiations initiated by the recipient, the communication is functional to the request and falls, as appropriate, within the pre-contractual purposes or the management of the B2B business relationship described above; it is not an unsolicited promotional communication. If, by contrast, Tubi Italflex intends on its own initiative to send a promotional e-mail to a prospective new customer or one of its contacts, consent must be obtained before sending, except where all the conditions of the so-called "soft spam" exemption under Article 130(4) are met. Merely providing this Privacy Notice, including as an attachment to the first e-mail, does not replace any consent that may be required. Where the communication is lawful, the recipient may withdraw consent or, where applicable, object to further communications free of charge, including by replying to the message or writing to the privacy contact indicated in Section 1; a web unsubscribe link is not required.

6. Identity Documents and the Data Minimisation Principle

Data obtained from identity documents are processed only where unequivocal identification is necessary to comply with legal obligations, for specific administrative procedures, for the validity or execution of documents, or for requirements strictly connected with the relationship. As a rule, a full copy of the identity document is not retained where recording only the



necessary data is sufficient. Any complete copy is retained exclusively where there is a specific documented need or a statutory obligation, and only for the period strictly necessary.

7. Recipients, Processors and Authorised Persons

Personal data may be processed by Tubi Italflex personnel authorised pursuant to Articles 29 and 32(4) GDPR and instructed according to their duties. Within the limits relevant to the purposes described above, personal data may also be disclosed to professional advisers, banks and insurance companies, IT and cloud service providers, providers of administrative and accounting services, couriers and logistics operators, technical partners involved in the performance of the supply, public bodies, authorities or other parties to whom disclosure is necessary or required by law.

Qualification of external parties. Depending on the role actually performed, such parties act as processors pursuant to Article 28 GDPR, on the basis of a contract or other appropriate legal act, or as independent controllers. An up-to-date list of the categories of recipients and processors may be requested from the privacy contact indicated in this Privacy Notice. Personal data are not disseminated to the public unless such dissemination is expressly required by law.

8. Transfers of Personal Data to Third Countries

Where reasonably possible, Tubi Italflex gives preference to suppliers and infrastructures that process personal data within the European Economic Area (EEA). Where processing, including through suppliers or sub-processors, involves a transfer of personal data to a country outside the EEA, the transfer is carried out in compliance with Chapter V GDPR, on the basis of an adequacy decision under Article 45 GDPR or, in the absence of such a decision, by means of appropriate safeguards under Article 46 GDPR, including, where applicable, the standard contractual clauses adopted by the European Commission and any necessary supplementary measures. For transfers to participating organisations in the United States, where applicable, the adequacy decision relating to the EU-U.S. Data Privacy Framework may be relied upon. The derogations under Article 49 GDPR are relied upon only where the relevant conditions are met.

The data subject may request information on any transfers applicable to his or her personal data and on the safeguards adopted, as well as, where provided for by applicable law, a copy of those safeguards or information on where they have been made available.

9. Methods of Processing and Security

Processing may be carried out using paper-based, IT and telematic tools, in accordance with the principles of lawfulness, fairness, transparency, accuracy, data minimisation, purpose limitation and storage limitation. Tubi Italflex implements technical and organisational measures appropriate to the risk, in accordance with Article 32 GDPR, and restricts access to personal data to persons who need access for the performance of their duties. Any personal data breaches are managed in accordance with Articles 33 and 34 GDPR, including the notifications and communications required where the relevant conditions are met.

10. Retention Periods

Category / purpose	Retention criterion
Pre-contractual enquiries not followed by a business relationship	As a rule, up to 24 months from the last significant interaction, unless a documented need for longer retention, a statutory obligation or litigation requires otherwise.
Marketing consents, evidence of consent and suppression list	Evidence of consent is retained for the period necessary to demonstrate the lawfulness of communications and, in any event, within the applicable limitation periods. In the event of objection or withdrawal, the contact detail may be retained on a suppression list to the extent necessary to comply with the request and prevent further unwanted communications.
Contractual data and relevant business correspondence	For the duration of the relationship and thereafter, as a rule, for up to 10 years from termination or the last relevant transaction, to the extent necessary to comply with obligations and protect legal rights.
Accounting and tax documentation	For at least 10 years from the date of the last accounting entry, without prejudice to longer periods required by tax legislation, audits or litigation.
Data relating to representatives and professional contacts	For the duration of the relationship with the organisation to which the contact belongs and, thereafter, for the period necessary to manage residual obligations and protect legal rights, with updating or erasure when the data are no longer relevant.
Data obtained from identity documents	Only for the period necessary for the identification purpose or for any different period imposed by law; the full copy is not retained unless necessary.



Category / purpose	Retention criterion
Data relating to complaints, disputes or proceedings	For the period necessary to manage the matter and, thereafter, until its final conclusion and for the applicable limitation periods, taking into account any interruptions or suspensions.

At the end of the applicable retention periods, personal data are erased, anonymised or otherwise rendered no longer attributable to the data subject, unless a statutory provision or a documented need to protect legal rights requires further retention.

11. Automated Decision-Making

As a rule, personal data processed in connection with relationships with customers and prospective customers are not subject to decisions based solely on automated processing, including profiling, which produce legal effects concerning the data subject or similarly significantly affect him or her within the meaning of Article 22 GDPR. If processing of this nature is introduced in the future, specific prior information will be provided in accordance with applicable law.

12. Data Subject Rights

In the cases and within the limits provided for by the GDPR, the data subject may exercise the following rights:

- access to personal data and the information referred to in Article 15 GDPR;
- rectification of inaccurate personal data and completion of incomplete personal data pursuant to Article 16 GDPR;
- erasure of personal data in the cases provided for by Article 17 GDPR;
- restriction of processing in the cases provided for by Article 18 GDPR;
- data portability pursuant to Article 20 GDPR, where the processing is based on consent or on a contract and is carried out by automated means;
- objection, on grounds relating to the data subject's particular situation, to processing based on legitimate interests pursuant to Article 21(1) GDPR; the Controller may continue processing only where the conditions laid down in that Article are met;
- objection at any time to the processing of personal data for direct marketing purposes, without having to provide reasons; following objection, the personal data will no longer be processed for such purposes, pursuant to Article 21(2) and (3) GDPR;
- the right not to be subject to a decision based solely on automated processing in the cases provided for by Article 22 GDPR;
- withdrawal of consent at any time, by simple means and without affecting the lawfulness of processing based on consent before its withdrawal, where a specific processing activity is actually based on consent, pursuant to Article 7(3) GDPR.

Requests may be sent to the privacy contact indicated in Section 1. The Controller will respond without undue delay and, as a rule, within one month of receipt of the request, subject to the extension provided for by Article 12(3) GDPR in cases of particular complexity or where a large number of requests have been received. Where there are reasonable doubts concerning the identity of the person making the request, the additional information strictly necessary to verify identity may be requested.

13. Complaint and Judicial Remedies

A data subject who considers that the processing of his or her personal data infringes applicable law has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) pursuant to Article 77 GDPR and to seek a judicial remedy before the competent courts pursuant to Articles 78 and 79 GDPR. Further information is available on the Authority's institutional website, www.garanteprivacy.it.

14. Updating Personal Data and Amendments to this Privacy Notice

Data subjects are invited to notify any changes to their personal data that are necessary for the proper management of the relationship. Tubi Italflex may update this Privacy Notice in order to reflect changes in applicable law, organisational arrangements or the processing activities carried out. In the absence of a dedicated web page, the updated version may be provided directly to the data subject in electronic or paper format and may be requested at any time from the privacy contact indicated in Section 1. Where required by law or necessary in view of the significance of the changes, updates are communicated to data subjects through appropriate means.

Key legal references

Regulation (EU) 2016/679 (GDPR); Legislative Decree No. 196 of 30 June 2003, as subsequently amended; Article 2220 of the Italian Civil Code concerning retention of accounting records; Guidelines on transparency under Regulation 2016/679 (WP260 rev.01, adopted by the Article 29 Working Party and endorsed by the EDPB); Chapter V GDPR rules on international transfers and relevant European Commission decisions.