

**Privacy policy for customers**

**Valmet Tissue Converting S.p.A.**

**Who are we and what do we do with your personal data?**

The company **Valmet Engraving Solutions S.r.l.**, with its registered office in 55100 Lucca, Via Giovanni Diodati 50 (hereinafter also the "Data Controller"), as Data Controller will see to the confidentiality of your personal data and guarantee its necessary protection from any event that could put it at a risk of violation. The Data Controller applies policies and practices concerning the collection and use of personal data and the exercise of the rights recognized by the applicable legislation. The Data Controller is responsible for updating the policies and practices adopted for the protection of personal data whenever it becomes necessary and in any case whenever regulatory and organizational changes that may affect the processing of your personal data arise.

The Data Controller has appointed a Data Protection Officer (DPO) that you can contact if you have questions about the policies and practices adopted. The contact details of the Data Protection Officer are as follows: [dpo.engraving@valmet.com](mailto:dpo.engraving@valmet.com)

How does the Data Controller collect and process your data?

**The Data Controller collects and/or receives information about you, such as:**

- name, surname, fiscal code
- e-mail
- phone number
- address
- VAT number
- Bank account number
- Images/video

Your personal information will be processed for:

**1) the management of the pre-contractual negotiation, of the contractual relationship and the fulfilment of any other obligations including regulatory obligations, arising therefrom**

Purpose	Legal Basis
<ul style="list-style-type: none"> <li>• the management of the contractual relationship in all its phases from negotiations to its conclusion for whatever reason</li> <li>• monitoring and update of the supply conditions and/or services and of the mandates</li> <li>• registration, invoicing and bookkeeping</li> </ul>	<p>Execution of pre-contractual and contractual activities</p> <p>Fulfilment of legal obligations and depending on the contract and the relationship established, such as, among others, those arising from:</p> <ul style="list-style-type: none"> <li>• Presidential Decree no. 633/1972 and subsequent amendments and integrations</li> </ul>

**Valmet Tissue Converting S.p.A.**

Società unipersonale/Sole shareholder company  
 Sede legale/Registered office: Via Giovanni Diodati, 50 · 55100 Lucca · Italy  
 Sedi Operative/Facilities: Via Giovanni Diodati, 50 · 55100 Lucca · Italy \* Via S.Vitalino, 7 · 40012 Calderara di Reno · Bologna · Italy  
 Lucca: Tel. +39 0583 4601 · Calderara di Reno: Tel. +39 051 3174 111  
 PEC: [valmettissuespa@pec.it](mailto:valmettissuespa@pec.it) · [info.ti.luc@valmet.com](mailto:info.ti.luc@valmet.com) · [www.valmet.com](http://www.valmet.com)  
 Capitale Sociale/Share capital: € 41.743.000,00 · C.F., P.IVA e Iscr. Reg. Imp. 00145160461  
 Gruppo Valmet/Valmet Group: Valmet Oyj, Keilasatama 5 / PO Box 11 02151 Espoo (Finland) Business ID 2553019-8

	<ul style="list-style-type: none"> <li>• Presidential Decree no. 600/1972 and subsequent amendments and integrations</li> </ul> <p>Code of Conduct of the Data Controller Fulfilment of economic, financial and social reporting obligations</p>
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Your personal data is also collected from third parties such as, by way of example:

- Other data controllers (e.g. companies of the group);
- Provider of information services.

## 2) for the communication to third parties and recipients

Purpose	Legal basis
<p>Communication to third parties, such as</p> <ul style="list-style-type: none"> <li>• Companies of the group for administrative purposes</li> <li>• Financial administration, public supervisory agencies</li> <li>• Tax advisers and accountants</li> <li>• credit institutions for payment management</li> <li>• -legal consultants for litigation and contract management</li> <li>• providers of IT services and HW and SW support and maintenance</li> <li>• -public and private entities</li> <li>• -couriers</li> <li>• auditors</li> </ul>	<p>Execution of pre-contractual and contractual activities</p> <p>Fulfilment of obligations depending on the contract</p> <p>Fulfilment of legal obligations, such as, among others, depending on:</p> <ul style="list-style-type: none"> <li>• Presidential Decree no. 633/1972 and subsequent amendments and integrations</li> <li>• Presidential Decree no. 600/1972</li> </ul> <p>Observance of transparency and economic and social reporting obligations</p>

Communication and dissemination concern the categories of data whose transmission and/or disclosure are necessary for the performance of the activities and purposes pursued by the Data Controller in the management of the relationship established. The relevant processing does not require the consent of the data subject in the event that the same takes place in the face of legal obligations or in order to give effect to the obligations arising from the contractual relationship or in the event of the occurrence of other hypothesis of exclusion (in particular application of the requirements of the Code of Conduct and/or legitimate interest of the Data Controller), expressly provided for or dependent on the rules and regulations applied by the Data Controller, or even through third parties identified as data processors.

## 3) for information security purposes

Purpose	Legal basis
<p>- implementation of the detection and notification of personal data violation (data breach)</p>	<p>Execution of activities depending on the established relationship</p> <p>Fulfilment of legal obligations (detection and notification of data breach events)</p> <p>Legitimate interest</p>

**How and for how long is your data stored?**

**How**

The data processing is performed through paper supports or IT procedures by specially authorized and trained internal subjects. Such internal subjects are allowed access to your personal data to the extent that it is necessary to carry out the processing activities that concern you. The data belonging to particular categories are treated separately from the others also by means of pseudonymisation or aggregation methods that do not allow you to be easily identified.

The Data Controller periodically verifies the tools through which your data is processed and the security measures provided for which it provides for constant updating; verifies, also through the subjects authorized to the treatment, that personal data of which the processing is not necessary is not collected, processed, filed or stored; verifies that the data is stored with the guarantee of integrity and authenticity and their use for the purposes of the treatments actually performed. The Data Controller guarantees that the data, even after the verifications, are found to be excessive or irrelevant will not be used except for the possible retention, according to the law, of the deed or document that contains them.

**Where**

The Data Controller may transfer your personal data abroad (non-EU countries) and in particular:

China, Brazil (Sister Companies) - Standard contractual clauses aimed at ensuring adequate safeguards, including data subjects' rights with regard to the transfer of personal data outside the EU.

Japan (Sister Company) – Adequacy decision EU-Japan.

USA (Sister Company) - Data Privacy Framework stipulated between EU and USA.

**For how long**

The personal data processed are kept for the time necessary to carry out the activities related to the management of the contract that you have stipulated with the Data Controller and for the fulfillments, including those required by law. arising therefrom.

In particular:

<p>identifying data accounting data data relating to professional and commercial activity</p>	<p>Duration of the contractual relationship</p> <p>Without prejudice to:</p> <ul style="list-style-type: none"> <li>• termination of the contract (for any reason)</li> <li>• the purposes that continue beyond the conclusion of the contract (e.g. bookkeeping, art. 2220 of the Italian Civil Code)</li> <li>• the prescription terms: from five to ten years from the definition of the relationship and in any case from the moment in which the rights that depend on it can be exercised (articles 2935, 2946 and 2947 of the Italian Civil Code)</li> </ul>
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	<ul style="list-style-type: none"> <li>for particular defensive needs the data strictly related to the contract may be kept for up to 40 years.</li> </ul> <p>Except in the event of litigation if it involves an extension of the aforementioned terms, for the time necessary to pursue the related purpose</p>
<p>Computer data (system and network access logs and/or IP addresses) The length of retention depends on the presumed and/or detected risk and the detrimental consequences thereof, subject to measures to anonymize the data or to limit its processing</p>	<p>In any case, the data must be retained (starting from the knowledge/detection of the danger event or data breach) for the time necessary to proceed with the notification to the guarantor authority of the data breach detected through the procedures implemented by the Data Controller and in any case to remedy it</p>

Once all the purposes that legitimize the retention of your personal data are exhausted, the Data Controller will take care of deleting them or making them anonymous.

**What are your rights?**

Your rights allow you to be in control of your data at all times. Your rights are those of:

- access;
- rectification;
- deletion;
- restriction of processing;
- objection to processing;
- portability.

In substance, you, at any time and free of charge and without special charges and formalities for your request, can:

- obtain confirmation of the processing carried out by the Data Controller;
- access your personal data and know the origin (when the data are not obtained from you directly), the purposes and the purposes of the processing, the data of the subjects to whom they are communicated, the period of retention of your data or the criteria useful for determining it;
- revoke the consent at any time, if this constitutes the basis of the processing. Withdrawal of consent in any case does not affect the lawfulness of the processing based on the consent given prior to the revocation;
- update or correct your personal data so that they are always accurate and accurate;
- delete your personal data from the data banks and / or archives including backups of the Data Controller in the case, among others, where they are no longer necessary for the purposes of the processing or if it is assumed to be illicit, and always if they exist the conditions required by law; and in any case if the treatment is not justified by another equally legitimate reason;
- limit the processing of your personal data in certain circumstances, for example where you have disputed its accuracy, for the period necessary for the Data Controller to verify its accuracy. You must be informed, in due time, even when the suspension period has been completed or the reason for the limitation of the processing has ceased, and therefore the limitation itself revoked;
- obtain your personal data, if their processing is based on a contract and with automated tools, in electronic format also for the purpose of transmitting them to another data controller.

The Data Controller must proceed in this way without delay and, in any case, at the latest within one month of receiving your request. The deadline can be extended by two months, if necessary, taking into account the complexity and the number of requests received. In such cases the Data Controller, within a month of receiving your request, must inform you and inform you of the reasons for the extension. For any further information and in any case to send your request, contact the Data Controller at [ES.it.privacy@Valmet.com](mailto:ES.it.privacy@Valmet.com)

#### **How and when can you oppose the processing of your personal data?**

For reasons related to your particular situation, you can oppose the processing of your personal data at any time when this takes place for legitimate prevailing reason or if it concerns the processing of personal data whose disclosure is subject to your consent, sending your request to the Data Controller at the address [ES.it.privacy@Valmet.com](mailto:ES.it.privacy@Valmet.com)

You have the right to the deletion of your personal data if there is no legitimate prevailing reason with respect to the one that gave rise to your request, and in case in the event that you are opposed to the processing of data.

#### **Who can you lodge a complaint with?**

Without prejudice to any other administrative or judicial action, you can file a complaint with the competent control authority or that which carries out its tasks and exercises its powers in Italy where you have your habitual residence or work or if different in the State Member where the violation of Regulation (EU) 2016/679 occurred.

Any update of this privacy policy will be communicated to you promptly and by appropriate means and the same will be communicated to you if the Data Controller proceeds to process your data for purposes other than those referred to in this statement before proceeding and in time to give your consent if necessary