

Notes on data processing

Information obligations according to Articles 13 and 14 GDPR 679/2016

1. Name and address of the data controller

This information applies to the processing of data by

barth Innenausbau SAS d. Ivo Barth srl & c.
via Julius Durst 38
I-39042 Bressanone
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F +39 0472 27 19 99
info@barth.it
www.barth.it

2. collection and storage of personal data as well as type and purpose and their use

a) Interested parties, customers, business partners, suppliers:

When you instruct us, we collect the following information:

- Title, first name, surname,
- valid e-mail address,
- Address,
- Telephone number (landline and/or mobile)
- tax identification number
- bank details
- for suppliers/service providers in exceptional cases also data for travel planning, e.g. passport

These data are collected

- to identify you as our customer/business partner;
- to advise you appropriately;
- to correspond with you;
- for operational, organizational, administrative, tax, financial, insurance and accounting reasons in connection with the contractual and/or pre-contractual relationship
- to fulfil legal obligations, obligations arising from ordinances, community standards as well as civil and tax laws.
- to settle any claims;
- for sending information material (e.g. newsletters and/or project folders) and technical and/or sales messages

Personal data are

- a) obligatory if when necessary in order to continue the contractual relationship entered into with you and to fulfil the above-mentioned purposes associated with obligations provided for in laws, ordinances or provisions of Community law; (Art. 6 para. 1 sentence 1 lit. b, c, GDPR)
- b) voluntarily when sending information material and technical and/or sales communications. (Art. 6 para. 1 sentence 1 lit. a, f, GDPR)

If you refuse to provide us with your mandatory personal data or any part of it, this is legitimate, but could affect the proper execution of our contractual relationship (e.g. no delivery is possible without address).

The personal data collected by us will be stored until the expiry of the statutory retention obligation and then deleted, unless we are obliged to store such data for a longer period in accordance with Article 6 para. 1 sentence 1 lit. c of the GDPR on the basis of tax and commercial law storage and documentation obligations or you have consented to further storage in accordance with Art. 6 para. 1 sentence 1 lit. a of the GDPR.

b) When visiting our website

When you visit our website www.barth.it, the browser on your device automatically sends information to the server on our website. This information is temporarily stored in a so-called log file. The following information is recorded without your intervention and stored until it is automatically deleted:

- IP address of the requesting computer,
- Date and time of access,
- Name and URL of the retrieved file,
- Website from which access is made (referrer URL),
- the browser used and, if applicable, the operating system of your computer as well as the name of your access provider

The mentioned data will be processed by us for the following purposes:

- ensuring a smooth connection of the website,
- ensure comfortable use of our website,
- evaluation of system security and stability as well as
- for other administrative purposes.

The legal basis for data processing is Art. 6 para. 1 sentence 1 lit. f GDPR. Our legitimate interest follows from the purposes listed above for data collection. Under no circumstances we use the data collected for the purpose of drawing conclusions about you personally. In addition, we use cookies and analysis services when you visit our website. You will find more detailed explanations under points 4 and 5 of this data protection declaration.

c) When subscribing to our newsletter and request our project folder

If you have expressly consented according to art. 6 para. 1 sentence 1 a GDPR, we use your data, e.g. e-mail address, to send you our newsletter at irregular intervals about our projects/reference, materials and technologies. To receive the newsletter, the double-opt-in procedure is necessary to ensure that you want our newsletter. In addition, we have concluded a contract with our external service provider on the procedure for processing order data. This ensures that our service provider complies in all respects with the strict requirements of European data protection law when sending the newsletter. This also ensures that your data is only stored within the EU with a high level of protection. Your data will not be stored on servers outside the EU.

You can unsubscribe at any time, for example via a link at the end of each newsletter. Alternatively, you are welcome to send your unsubscription request at any time to info@barth.it by e-mail.

If you have expressly consented according to art. 6 para. 1 sentence 1 lit. a GDPR, we will use your data, e.g. postal address, to send you our project folder and new project sheets by post. The data processing takes place exclusively for this purpose. You can unsubscribe at any time by sending an e-mail to info@barth.it.

3. Sharing your personal data

Your personal data will not be transmitted to third parties for purposes other than those listed above. We will only pass on your personal data to third parties if:

- you have given your express consent pursuant to Art. 6 para. 1 sentence 1 lit. a GDPR,
- the disclosure pursuant to Art. 6 para. 1 sentence 1 f GDPR is necessary to assert, exercise or defend legal claims and there is no reason to assume that you have an overriding interest worthy of protection in not disclosing your data,
- in the event that a legal obligation exists for the transfer pursuant to Art. 6 para. 1 sentence 1 lit. c GDPR, and
- this is legally permissible and is necessary for the processing of contractual relationships with you in accordance with Art. 6 para. 1 sentence 1 lit. b GDPR,

Recipients of personal data:

The following persons or groups of persons may become aware of your personal data and the following persons or groups of persons may be informed of your personal data:

- employees of barth Innenausbau who are authorized as such to process personal data
- external service providers from barth Innenausbau, such as tax consultants, freight forwarders, fitters, etc.
- judicial or supervisory authorities, administrations, corporations and public institutions, as well as legal persons, solely for the purpose of fulfilling obligations prescribed by legal, regulatory or Community law provisions.

Your data may also be passed on to foreign authorities or service providers (e.g. tax consultants) for the fulfilment of contracts and legal requirements.

4. Cookies

We use cookies on our site. These are small files that your browser automatically creates and that are stored on your device (laptop, tablet, smartphone, etc.) when you visit our site. Cookies do no damage to your end device, do not contain viruses, Trojans or other malware. Information is stored in the cookie that results in each case in connection with the specifically used terminal device. However, this does not mean that we immediately become aware of your identity. The use of cookies serves on the one hand to make the use of our offer more pleasant for you.

On the other hand, we use cookies to statistically record the use of our website and to evaluate it for the purpose of optimizing our offer (see point 5). These cookies enable us to automatically recognize when you return to our site that you have already been with us. These cookies are automatically deleted after a defined period of time. The data processed by cookies is required for the aforementioned purposes in order to protect our legitimate interests and those of third parties pursuant to Art. 6 Para. 1 S. 1 lit. f GDPR. Most browsers automatically accept cookies. However, you can configure your browser so that no cookies are stored on your computer or a message always appears before a new cookie is created. However, the complete deactivation of cookies can lead to the fact that you cannot use all functions of our website.

5. Tracking tools

a) Tracking tools - The tracking measures listed below and used by us are carried out on the basis of Art. 6 para. 1 sentence 1 f GDPR. With the tracking measures used, we want to ensure that our website is designed to meet requirements and is continually optimized. On the other hand, we use the tracking measures to statistically record the use of our website and to evaluate it for the purpose of optimizing our offer. These interests are to be regarded as legitimate within the meaning of the aforementioned provision. The respective data processing purposes and data categories can be found in the corresponding tracking tools.

b) Google Analytics We use Google Analytics, a web analysis service of Google Inc. (<https://www.google.de/intl/de/about/>) (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;

hereinafter "Google"). In this context, pseudonymized user profiles are created and cookies are used. The information generated by the cookies about your use of this website, such as

- Browser type/version,
- operating system used,
- Referrer URL (the previously visited page),
- Host name of the accessing computer (IP address),
- Time of the server request.

are transferred to a Google server in the USA and stored there. The information is used to evaluate the use of the website, to compile reports on the website activities and to provide further services associated with the use of the website and the Internet for the purposes of market research and demand-oriented design of these Internet pages. This information may also be transferred to third parties if this is required by law or if third parties process this data on behalf of the company. Under no circumstances will your IP address be merged with other data from Google. The IP addresses are anonymized so that an assignment is not possible (IP masking).

For more information on data protection and possible settings in connection with Google Analytics please consult the support of Google Analytics (<https://support.google.com/analytics>).

6. Rights of the persons concerned

You have the right:

- to request information about your personal data processed by us in accordance with Art. 15 GDPR. In particular, you may request information about the purposes of processing, the category of personal data, the categories of recipients to whom your data have been or will be disclosed, the planned storage period, the existence of a right to rectification, deletion, restriction of processing or objection, the existence of a right of appeal, the origin of your data, if these have not been collected by us, and the existence of automated decision-making including profiling and, if applicable, meaningful information on their details;
- in accordance with Art. 16 GDPR, to demand without delay the correction of incorrect or complete personal data stored by us;
- to request the deletion of your personal data stored by us in accordance with Art. 17 GDPR, unless the processing is necessary to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims;
- pursuant to Art. 18 GDPR, to demand the restriction of the processing of your personal data if you dispute the accuracy of the data, if the processing is unlawful but you refuse to delete the data and we no longer need the data, but you need it to assert, exercise or defend legal claims or you have filed an objection against the processing pursuant to Art. 21 GDPR;
- in accordance with Art. 20 GDPR, to receive your personal data, which you have provided to us, in a structured, current and machine-readable format or to request the transmission to another person responsible;
- according to art. 7 para. 3 GDPR to revoke your consent once given to us at any time. As a result, we are no longer allowed to continue processing data based on this consent in the future and
- to complain to a supervisory authority pursuant to Art. 77 GDPR. As a rule, you can contact the supervisory authority at your usual place of residence or workplace or at our company headquarters.

7. Right of objection

If your personal data are processed on the basis of legitimate interests pursuant to Art. 6 (1) (1) (f) GDPR, you have the right to object to the processing of your personal data pursuant to Art. 21 GDPR, provided that there are reasons for this which arise from your particular situation or the objection to

direct advertising. In the latter case, you have a general right of objection, which we will implement without specifying a particular situation. If you wish to exercise your right of revocation or objection, simply send an e-mail to info@barth.it

8. Data security

We use the most common SSL (Secure Socket Layer) method in connection with the highest level of encryption supported by your browser. Usually this is a 256-bit encryption. If your browser does not support 256-bit encryption, we use 128-bit v3 technology instead. Whether a single page of our website is transmitted in encrypted form is indicated by the closed display of the key or lock symbol in the lower status bar of your browser.

We also use suitable technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

9. Up-to-dateness and amendment of this data protection declaration

This data protection declaration is currently valid. Due to the further development of our website and offers above or due to changed legal or official requirements, it may become necessary to change this data protection declaration. You can access and print out the current data protection declaration at any time on the website at www.barth.it under Privacy.

Bressanone, 27th August 2018