



Re: Personal data privacy notice, pursuant to art. 13, EU Regulation no. 2016/679 – the “GENERAL DATA PROTECTION REGULATION” (hereinafter the “GDPR”) and Leg. Dec. 196/2003, as supplemented by Leg. Dec. 101/2018.

This Privacy Notice is to inform you of the methods used by ITW TEST AND MEASUREMENT ITALIA S.R.L. (hereinafter, the “Company”) to process the personal data we collect from you as Customer (or representative in any capacity of one of our Customers). This information is also available on our website, in the privacy area. Where not otherwise specified, all articles quoted refer to the Regulation indicated in the title.

1) Data Controller

The Data Controller is the Company ITW TEST AND MEASUREMENT ITALIA S.R.L., with registered offices and operational headquarters in Via Airauda, 12 Pianezza (10044 - TO), VAT no. IT00468990015.

2) Appointment of DPO (Data Protection Officer)

The Data Controller, not falling under the cases listed in Art. 37 of the GDPR, nor those indicated in the various interpretations of the Italian Data Protection Authority, is not required to appoint a Data Protection Officer.

3) Subject of the processing

The processing concerns:

1. identification and contact data (for example name, last name, academic qualification, address, telephone number, e-mail, job title), hereinafter, “personal data”, provided by you for the preparation, conclusion or execution of supply and service contracts by the Data Controller.
2. If required, data concerning the financial reliability of the administrators, in addition to the commercial information requested by the Company for its customer assessment process.
3. Any special category data provided voluntarily in the scope of credit recovery activities.
4. Identification and contact data specifically collected for management of the training courses organized by the service.

4) Purpose, lawful basis for processing and provision of personal data.

The purpose of the processing referred to in para 3.1 is to facilitate execution of the contract stipulated with the Data Controller. The processing is lawful pursuant to Art. 6, subsection 1) lett. b) of the GDPR. The provision of the data is mandatory, under penalty of the impossibility to correctly manage contractual aspects.

The purpose of the processing referred to in para. 3.2 is to protect the legitimate interests of the Data Controller (asset protection). The processing is lawful pursuant to Art. 6, subsection 1) lett. f).

The purpose of the processing referred to in para. 3.3 is to protect the legitimate interests of the Data Controller (asset protection). The processing is lawful pursuant to Art. 6, subsection 1) lett. f) and Art. 9, subsection 2) lett. e).

The purpose of the processing referred to in para 3.4 is to facilitate execution of the training agreement stipulated with the Data Controller. The processing is lawful pursuant to Art. 6, subsection 1) lett. b) of the GDPR. The provision of the data is mandatory, under penalty of the impossibility to correctly manage the training activities.

5) Method of processing, duration of processing

The personal data provided under paragraphs 3.1 and 3.4 is subject to the operations indicated in Art. 4, n. 2) of the GDPR, and specifically: collection, registration, organization, storage, consulting, use, block, communication, deletion and destruction. Your personal data may be processed both manually and by automated means.

All data you provide with fiscal/financial relevance will be kept in our archives for a period of 10 years, as contemplated by current legislation. In any case, all the data provided by you will be stored, unless otherwise indicated by you, for a period closely related to the useful life of the machinery subject to the sales and/or service contract. The updating of this data either occurs under your direct instruction or through the action of



the Owner's commercial staff, during a service check/update or contract renewal.

The processing of the personal data referred to in paragraph 3.2, collected for the purposes referred to in paragraph 4, is carried out through the operations indicated in Art. 4, n. 2) of the GDPR, specifically: collection, consulting, use, deletion and destruction. The processing takes place in a lawful manner and the data collected is not in excess with respect to the need to protect the Company, with a view to balancing the interests of the Data Controller and protecting the data subjects, with particular reference to the data indicated in Art. 10.

The processing of the personal data referred to in paragraph 3.3, collected for the purposes referred to in paragraph 4, is carried out through the operations indicated in Art. 4, n. 2) of the GDPR, specifically: collection, storage, organization, consulting, use, communication, deletion and destruction. The processing takes place in a lawful manner and the data collected is not in excess with respect to the need to protect the Company, with a view to balancing the interests of the Data Controller and protecting the data subjects.

6) Access to the data

Your data may be made available for the purposes referred to in para. 4) to employees and collaborators of the Data Controller, in their capacity as data processors and/or system administrators, or to third party companies or other entities (by way of example, credit institutions, professional studios, consultants, insurance companies for the provision of insurance services, etc.) that conduct certain operations on behalf of the Data Controller on an outsourcing basis, in their capacity as external data processors.

7) Communication of the data

Without the need for explicit consent (pursuant to Art. 6 lett. b), c) of the GDPR), the Data Controller may communicate your data for the purposes referred to in para. 4) to Supervisory boards, Judicial authorities, insurance companies for the provision of insurance services, to the parent company ITW Inc. and companies of the ITW Ltd. Group, as well as to entities to which communication is mandated by law for said purposes. Such entities shall process the data in their capacity as independent data controllers. Your data will not be distributed.

8) Data transfer outside the EU

Personal data provided under para 3) will be stored in electronic and/or hard copy format on servers and/or physical archives located at the offices of the Data Controller, within the European Union, and at data centres belonging to the parent company ITW Inc. in the United States of America, and at companies of the ITW Ltd. Group in the United Kingdom. It is hereby understood that the Data Controller, if necessary, shall have the faculty to move said archives and servers to other EU or non-EU states, for the use of Cloud services for example, or in the event certain data must be transferred to the ITW parent company in Glenview, Illinois, USA. In such an event the Data Controller hereby ensures that the transfer of data outside the EU shall take place in compliance with the applicable provisions of law, upon stipulation of the standard contractual clauses established by the European Commission.

9) Rights of the Data Subject

As data subject, you have the rights referred to in articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR. In detail

- Right of access
- Right to rectification
- Right to erasure ('right to be forgotten')
- Right to restriction of processing
- Right to mandatory notification in the event of rectification or erasure of personal data or restriction of processing
- Right to data portability
- Right to object
- Rights related to Automated decision making, including profiling

10) Methods for the exercise of data subject rights

You may exercise your rights at any time by sending:



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- a registered letter addressed to the Data Controller, referred to in paragraph 1)
 - an e-mail to privacy@instron.com

ITW TEST AND MEASUREMENT ITALIA S.R.L.
Pianezza (TO)