



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 or obtain from public databases in the event of events or fairs, visits or commercial contracts. 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 identification and contact data (for example name, last name, academic qualification, address, telephone number, e-mail, company name, company role and other information that may appear, for example, on your business card), hereinafter, “personal data”, provided:

1. through your business card (personal or representing a Company in whatever role), or in any case through contacts with our commercial personnel;
2. through our information request forms, present on the Company website;
3. through public lists available on-line, to which you autonomously provided your personal data for the purposes of commercial contacts
4. through the lists issued by the trade fairs in which the Company has taken part, containing your data, only in the event you have consented to this processing at each trade fair.
5. through the data communication forms included in on-line marketing campaigns (Google, various social networks)

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

The purpose of the processing referred to in paragraph 3 concerns the correct management of relations with customers or potential customers, through direct communications in response to questions or direct contact by the Company for institutional or commercial communications. The process is lawful pursuant to Art. 6, subsection 1), letter f), in that direct marketing is considered an overriding legitimate interest of the Data Controller. If you do not wish to receive communications and contacts from us, simply let us know in the manner explained in paragraph 10 of this document, and we will act accordingly, in full respect of your rights.

5) Method of processing, duration of processing

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

All data provided by you for the purposes stated above are retained for a maximum period of 2 years from the last interaction, or until you choose to exercise the right to be forgotten or to limit processing.

6) Access to the data

The data provided under paragraph 3 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

The personal data provided 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:

- 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)