

## **PRIVACY POLICY CONTACT FORM**

### **pursuant to Article 13 of the EU Regulation No. 2016/679 (GDPR)**

The Company LG Graphite S.r.l. having its registered office in Via Pietro Mascagni n.1 Milan, 20122, Italy, as data controller (hereinafter the “**Company**” or the “**Data Controller**”), pursuant to Art.13 of the EU Reg. 2016/679 (hereinafter “**GDPR**”), informs you that your data will be processed in the following modalities and for the following purposes:

#### **1. Subject of Data processing**

This policy concerns the processing of your Personal Data (“**Personal Data**”) as a Data Subject (“**Data Subject**”).

Personal Data that the Company usually process include, but is not limited to, personal and contact data through the compilation of contact forms, in particular name, surname, telephone number, e-mail address and any other Personal Data contained in the message transmitted by the Data Subject.

#### **2. Purpose of the processing**

The processing of your Personal Data is intended to respond to the Data Subject’s request/communication made by the compilation of the contact form on the website <https://www.lggraphite.com/>.

#### **3. Legal basis of the processing**

The legal basis of the processing is the specific consent to carry out the purposes indicated in point 2. The Data Subject is free to give consent and may be able to revoke it at any time. The consent is necessary to carry out the purposes indicated in point 2.

#### **4. Modalities of the processing**

The processing, represented by any operation or complex of operations among those indicated in Art. 4 paragraph 1 n.2) GDPR, is:

- a. carried out– with the help of manual, IT and telematic tools, as well as using logics and methods strictly related to the purposes indicated in point 2 – in such a way as to guarantee the security and the confidentiality of Personal Data;
- b. carried out directly by the organization of the Data Controller.

#### **5. Data Access**

Pursuant to art. 15 GDPR, you have the right to obtain the confirmation from the Company that there is a processing of your Personal Data or not, and the right to obtain access to your Personal Data and the related information. If Personal Data are transferred to another country or international organization, you have the right to be informed about the existence of adequate guarantees pursuant to art. 46 GDPR relating to transfer of Personal Data.

#### **6. Communication of Data**

In order to fulfill the purposes mentioned in point 2, Personal Data may be communicated:

- a. To third parties, who are suppliers, contractors and agents for the purpose of carrying out activities related and instrumental to the management of the request. Recipients will have access to personal

information as necessary to perform their functions and they will be obligated to the contractual obligations of confidentiality;

- b. To governmental or judicial authorities in order to fulfill legal or regulatory responsibilities.

## **7. Disclosure of Data**

Personal Data may be subject to disclosure in accordance with obligations imposed by laws, regulations or other national or EU legislation, or as a result of instructions issued by competent Authorities.

## **8. Data Retention**

Your Personal Data will be retained in full respect of the security measures required by the legislation concerning the protection of Personal Data. In addition, your Personal Data will be stored for the period necessary to comply with legal obligations. The Data retention period is determined according to the purpose for which Personal Data are processed and to the tools used. Your Personal Data will be preserved for a period of time that is necessary for the achievement of the purposes for which they are collected and processed. The retention period of Personal Data must comply with the terms of the law.

## **9. Transfer of Personal Data abroad**

Personal Data may be disclosed to the entities indicated in point 6, even if this involves the transfer of these data to other countries in EU or to third countries. However, different country must comply with the criteria indicated by the EU Commission in order to guarantee an adequate level of protection. Otherwise, LG Graphite S.r.l. will implement appropriate measures to preserve the confidentiality of Personal Data.

## **10. Rights of Data Subject**

Articles from 15 to 22 of the GDPR grant you, as Data Subject, certain specific rights, as indicated hereinbelow:

- a. Right of access: pursuant to Article 15 GDPR, the Data Subject has the right to claim the confirmation of the fact that the Company is processing any his/her Personal Data. In this case, Data Subject can have access to his/her Personal Data and to some information regarding the processing.  
If Personal Data is transferred to a third country or international organization, the Data Subject has the right to be informed about the existence of adequate guarantees pursuant to art. 46 GDPR related to the transfer.
- b. Right to rectification: pursuant to Article 16 GDPR, the Data Subject has the right to obtain the rectification of inexact Personal Data and the integration of incomplete Personal Data, without unreasonable delay.
- c. Right to erasure: pursuant to Article 17 GDPR, the Data Subject has the right to obtain, without unreasonable delay and at any moment, the erasure of his/her Personal Data in the cases provided by the GDPR. The Data controller will consider the possibility of granting the request and if it is determined that, according with the law, your request for Personal Data's erasure can be granted, the Data Controller will immediately proceed with the erasure.
- d. Right to limitation: pursuant to art. 18 GDPR, the interested party has the right to obtain the limitation of the processing, in the cases provided for by the GDPR;
- e. Right to data portability: pursuant to Article 20 GDPR, the Data Subject has the right to receive Personal Data given to the Data Controller in a structured, machine-readable and commonly used format, and the right to obtain their transmission to another Data Controller without impediments in the cases indicated by GDPR.
- f. Right to object: pursuant to Article 21 GDPR, the Data Subject has the right to object to the processing of his/her Personal Data, unless there are legitimate reasons for the Data Controller to continue the processing;

The Data Subject has the right to submit a complaint to the Supervisory Authority pursuant to Article 77 GDPR.

Since the processing of Personal Data is based on consent, the Data Subject has also the right to revoke consent at any moment. Revocation of consent doesn't make unlawful the processing based on consent given before that revocation.

#### **11. Modality of the exercise of rights**

In order to exercise his/her rights, the Data Subject can submit an e-mail to the following e-mail address: [dpo@lggraphite.com](mailto:dpo@lggraphite.com) .

#### **12. Contact**

The Company informs that questions, comments and requests regarding this policy should be sent to the Company by sending an e-mail to the following e-mail address: [dpo@lggraphite.com](mailto:dpo@lggraphite.com) .

The Data protection Officer (DPO) designated by the Data Controller pursuant to article 37 GDPR, is the company Epta-Key S.r.l., in the person of Mr. Giovanbattista Bernardo. The DPO can be contacted at the following e-mail address: [dpo@lggraphite.com](mailto:dpo@lggraphite.com) .

#### **13. Data Controller**

The Data Controller is the company LG Graphite S.r.l. having its registered office in Via Pietro Mascagni n.1 Milan, 20122, Italy.