

On the basis of Regulation (EU) n. 2016/679, we report our privacy policy.

## **1. General principles for processing of personal data**

In order to ensure that your personal data is processed correctly and with a suitable level of data protection, Trex Srl has adopted the following processing principles:

- Personal data is processed lawfully, fairly and in a transparent manner;
  - Personal data is collected only for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
  - Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
  - Personal Data shall be accurate and, where necessary, kept up to date and inaccurate or incomplete personal data will be rectified or erased or further processing suspended.
  - Personal data shall not be kept in a form which permits identification of the Data Subjects for longer time than necessary for the purposes for which the data was collected or for which it is further processed.
  - Personal data shall be processed in a manner that ensures appropriate security of the personal data.
- Trex Srl will always inform you of the collection and processing of your personal data unless we have a legitimate reason not to do so.

## **2. Types of personal data**

We will collect and process your personal data in a number of ways when you engage with us via the various existing channels.

Some of the personal data is necessary to process in order for us to provide you with the services you have requested and some personal data you can choose to provide voluntarily. We will always let you know which personal data is necessary to (fully) satisfy your request.

The personal data that we collect and process can generally be divided into the following categories:

- Contact information such as name, address, phone number, email address, etc.
- Tax information such as VAT number etc.
- Information that you provide when contacting us via online contact forms, emails or phone
- User information such as technical data regarding usage and viewing, including IP addresses when you visit our website
- Bank information when you purchase goods or services from us

As a general rule we will not process any special categories of personal data (special personal data) about you unless you have provided your explicit consent thereto or we are required to do in order to comply with applicable regulation.

## **3. Our purposes for processing your personal data**

We only process your personal in order to pursue a legitimate purpose and generally we will only process your personal data if:

- You have provided your consent to such processing;
- The processing is necessary for the performance of a contract;
- The processing is necessary for compliance with a legal obligation that we are subject to;
- The processing is necessary for the purposes of the legitimate interests pursued by us or by a third party and such processing is not considered to be harmful towards you.

We process your personal data for the following purposes:

- To provide you with products, services and information that you request from us;
- To administer our business relations and negotiate and execute agreements;
- To provide general customer service and support;
- To gain customer insights and knowledge of how our various services, including websites, and products are used as well as evaluation and improvement hereof;
- To communicate with you regarding various matters;
- To comply with any applicable law.

#### **4. Cookies**

We may use cookies on our websites.

A cookie is a small text file that improves your user experience when you return to a website you have already visited. Cookies that are essential, also known as 'strictly necessary' cookies, enable features without which you would not be able to use the website as intended. Your consent is not required for the use of strictly necessary cookies.

The purposes of processing of data collected by the use of cookies, are the following:

- to operate, improve and optimise the performance and user experience of the website;
- perform customer and user analysis and segmentation in order to improve our understanding of our users, and provide better and tailored services to users, including you;
- statistical purposes.

#### **5. Disclosure, transfer and making available personal data to recipients**

Our disclosure and transfer of your personal data to recipients (natural or legal persons, public authorities, agencies or another body, to which the personal data is disclosed) is kept to a minimum and is subject to the existence of an adequate level of data protection.

We may disclose or make personal data available to recipients under the following circumstances:

- Recipients who carry out services on our behalf, such as e.g. IT-support, administrative services, training services or other data processing. Such recipients are only allowed to process the personal data in accordance with our instructions;
- To establish, exercise or defend our legal rights;
- If you have provided your prior consent to the disclosure of personal data to a recipient;
- In the event of any merger, sale, joint venture, assignment, transfer or other disposition of Trex Srl's assets;
- As set out in our cookie-policy, cf. section 4 above.

#### **6. Automated individual decisions**

We may use automated decision making based on your personal data. Automated decision making will only take place if the decision is:

- necessary for entering into, or performance of a contract between you and Trex Srl;
- authorised by Italian or Union law to which Trex Srl is subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests;
- based on your consent.

In case we use automated decision making, we will ensure that suitable security measures are implemented.

Special personal data will in no event be subject to automated decision making unless you have provided your explicit consent or the processing is necessary for reasons of substantial public interest, on the basis of applicable law.

#### **7. Your consent**

As stated above some of our processing activities will be based on your consent. In such case, you will have the right to withdraw your consent at any time.

If you withdraw your consent, we will cease to process your personal data, unless and to the extent the continued processing or storage is permitted or required according to the applicable personal data legislation or other applicable laws and regulations.

Please note that the withdrawal of your consent will not affect the lawfulness of processing conducted prior to the withdrawal. Further, as a consequence of your withdrawal of your consent, we may not be able to satisfy your requests or provide you with our services.

#### **8. Data Security**

In order to safeguard your personal data, Trex Srl has implemented appropriate technical and organizational measures to ensure a level of security appropriate to the risks represented by the processing and the nature of the personal data to be protected.

Following the evaluation of the risk, Trex Srl has taken measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access, in particular where

the processing involves the transmission of personal data over a network, and against all other unlawful forms of processing.

## **9. Training**

In order to ensure that we always comply with applicable data protection legislation and that our employees are familiar with such regulation, we have established an internal privacy training for all employees with permanent or regular access to personal data.

## **10. Internal audits**

Trex Srl carries out regular audits of the ongoing processing of personal data that cover all aspects, including all IT systems, databases, security policies/standards, training programmes, privacy policies etc.

## **11. Your rights**

You have the right to access to the data processed about you, subject to certain statutory exceptions. Furthermore, you can object to the collection and further processing of your personal data. In addition, you have the right to correct your personal data, if necessary. You may also choose to request us to restrict the processing.

We will delete or correct any information, which is inaccurate or out of date by reason of the time elapsed since it was collected or by reason of any other information in our possession.

If you provide us with a written request, we will also delete your personal data without undue delay, unless we have a legal basis to continue the processing, e.g. if the processing is necessary to establish, exercise or defeat a legal claim or necessary to the performance of a contract with you.

In order to make use of any of the rights mentioned above, please contact us via the points of contacts listed in section 14.

With regard to such requests, kindly provide us with relevant information to take care of your request, including your full name and email address so that we can identify you. We will respond to your request as soon as possible and within one month.

If you disagree with our processing of your personal data please be informed that you can lodge a complaint with Trex Srl.

## **12. Complaints**

If you have any complaints about the processing of personal data carried out by Trex Srl, please contact us via the points of contacts listed in section 14.

We will review and assess your complaint and if necessary we may contact you in order to obtain further information.

We strive at processing any complaint or objection within one month. If it is not possible to make a decision within one month, we will inform you grounds for the delay and of the time (not exceeding 6 months from receipt) at which the decision can be expected to be provided.

## **13. Changes to this Privacy Policy**

We reserve the right to amend this Privacy Policy in the future due to changes in applicable legislation or Trex Srl's processes. We will inform you of any such amendments.

## **14. Contact information**

If you have a request or a question regarding you processing of personal data or this privacy policy in general, please contact:

TREX Srl

Via Varesche, 10 Albarè 37010 Costermano sul Garda (VR)

Phone +39 (0) 45.620.10.70

Fax + 39 (0) 45.620.61.26

E-mail: [info@trex-italy.com](mailto:info@trex-italy.com)

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