

Information Notice on Personal Data Processing

(art. 13 of EU Regulation No. 679/2016)

TRAMO GROUP (hereinafter also "Data Controller") protects the confidentiality of personal data and guarantees their protection from any event that may expose them to data breach.

As envisaged by European Union Regulation No. 679/2016 (GDPR), and especially by Art. 13, here below we provide the user (Data Subject) with the information on the processing of personal data as requested by law.

1) Identity and contact information of the Data Controller (art. 13, §1, letter a of the GDPR).

TRAMO GROUP includes the following enterprises:

1. **TRAMO SRL** with headquarters in Inverigo (CO), Via Valsorda. Can be contacted by writing to the address indicated or by e-mail to info@tramo.it;
2. **DMI SRL** with headquarters in Inverigo (CO), Via Valsorda – corner with Via per Brenna. Can be contacted by writing to the address indicated or by e-mail to info@dmitrasporti.com;
3. **DMI TRIVENETO SRL** with headquarters in Bassano del Grappa (VI), Via Luigi Gallo 9/11. Can be contacted by writing to the address indicated or by e-mail to info@dmitriveneto.com;
4. **TRAMO SA** with headquarters in Chiasso (Switzerland), Via General Dufour 6. Can be contacted by writing to the address indicated or by e-mail to info@tramo.ch;
5. **TRAMO CONTRACT SA** with headquarters in Chiasso (Switzerland), Via General Dufour 6. Can be contacted by writing to the address indicated or by e-mail to info@tramocontract.com;
6. **TRAMO LORENZONI SA** with headquarters in Chiasso (Switzerland), Via General Dufour 6. Can be contacted by writing to the address indicated or by e-mail to info@tramo.ch;
7. **TRAMO UK LTD** with headquarters in Bedfordshire (UK), Unit 16, Albone Way – Biggleswade. Can be contacted by writing to the address indicated or by e-mail to info@tramo.co.uk;
8. **TRAMO BRANDS MEUBEL TRANSPORT BV** with headquarters in Tegelen (The Netherlands), Tichlouwstaat 45. Can be contacted by writing to the address indicated or by e-mail to info@brandsmeubeltransport.nl;
9. **TRAMO FRANCE SARL** with headquarters in Aulnay Sous Bois (France), Garonor Bat 1 Cellule 35-38. Can be contacted by writing to the address indicated or by e-mail to info@tramo.fr;
10. **TRAMOES SL** with headquarters in Granollers (Spain), Pol. Industrial Congost, Calle G. Marconi 10-12. Can be contacted by writing to the address indicated or by e-mail to info@tramo.es;
11. **TRAMO USA INC.** with headquarters in Bayonne, NJ (USA), 99 Hook Road. Can be contacted by writing to the address indicated or by e-mail to info@tramoathome.com;
12. **TRAMO@HOME LA INC.** with headquarters in Carson, CA (USA), 24640 S. Main St.. Can be contacted by writing to the address indicated or by e-mail to info@tramoathome.com;
13. **TRAMO@HOME NY INC.** with headquarters in Bayonne, NJ (USA), 99 Hook Road. Can be contacted by writing to the address indicated or by e-mail to info.ny@tramoathome.com;
14. **TRAMO@HOME MIAMI INC.** with headquarters in Medley, FL (USA), 8900 NW 77th Ct.. Can be contacted by writing to the address indicated or by e-mail to info.fl@tramoathome.com;
15. **TBS TRAMO** with headquarters in Bayonne, NJ (USA), 99 Hook Road. Can be contacted by writing to the address indicated or by e-mail to info@tbstramo.com.

TRAMO GROUP supplies most of the information and related service infrastructure, and each enterprise belonging to the Group, through its own legal representative, acts as Data Controller pursuant to articles 4 and 24 of the Regulation.

2) Data processed (art. 15, letter b of the GDPR).

CATEGORIES OF DATA	EXAMPLES
Identification Data	First name, last name, company name, geographical address, nationality, province and municipality of residence, landline and/or mobile phone, fax number, Tax registration code and VAT number, e-mail address(es)
Bank Data	IBAN and bank/post office data (except for Credit Card number)

TRAMO GROUP will not ask Data Subjects to provide so-called “special categories” of data, namely, as indicated in the GDPR (art. 9), personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation. Should the performance requested imply the processing of this category of data, the Data Subject will receive a preliminary notice and will be requested to give explicit consent.

3) Purposes of personal data processing (art. 13, §1 of the GDPR).

The personal data provided to the undersigned Data Controller will be processed only for the purposes concerning the fulfilment of the work or cooperation agreement being entered into or already existing with the undersigned Data Controller, in compliance with the provisions of art. 13 of the Regulation and with the confidentiality obligations. The definition "purposes concerning the fulfilment of the agreement" means any data processing operation connected to the management, administration and fulfilment of the underlying contractual relationship. The legal basis of processing for these purposes is art. 6, § 1, letter b) of the GDPR ("Processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract").

Within the scope of these purposes, processing is also performed for the fulfilment of the legal (accounting and/or taxation) obligations pertaining to the management of the work relationship. The legal basis of processing for these purposes is art. 6, § 1, letter c), ("Processing is necessary for compliance with a legal obligation to which the Data Controller is subject").

4) Data processing methods (art. 13, §1 of the GDPR).

The Data Controller will put in place suitable security measures in order to protect the confidentiality, integrity and availability of the personal data of the Data Subject and will impose on third party suppliers and on Data Processors the use of similar security measures.

As regards the foregoing purposes, the processing of your personal data will be done manually and/or by computerised or telematic means only for the accomplishment of said purposes, and anyhow in such a way as to ensure their security and confidentiality.

5) Transfer to third parties and categories of recipients (art. 13, §1 of the GDPR).

The processing of your personal data will be performed only by subjects expressly and specifically designated by the Data Controller and operating on the Data Controller’s premises or branch offices in the capacity as Data Processors (art. 28) or as persons acting under the authority of the Data Controller or Processor (art. 29), or as persons expressly appointed for data processing under the terms envisaged by the GDPR and by the national regulations implementing the provisions of the GDPR. The data provided may also be processed by the Data Controller directly and even communicated to third parties when such

processing is functional to legal and/or contractual obligations. Under such communication purpose, the data may be disclosed to companies or to external professionals the Data Controller may employ for the purposes indicated in this Information Notice.

The data may be communicated, for the purpose of allowing the fulfilment of contractual and legal obligations, to post offices, to shipping companies and couriers for the sending of documents, to banks for accounting purposes related to contract execution, as well as to Public Authorities as per the law, to third parties for the supply of IT or storage services and to external professionals for accounting and taxation purposes.

The personal data of the Data Subject will not be disclosed, i.e. the Data Controller will not in any way make them known to or place them at the disposal of undefined subjects.

The Data Controller will require that its Third party suppliers and Data Processors comply with the same security measures as those applied with regard to the Data Subject, restricting the scope of action of the Data Processor to processing connected to the performance requested.

The Data Controller will not transfer your personal data to third countries in which the GDPR is not applied (non-EU member states), except under specific contrary indications about which you will be preliminarily informed and for which your consent will be asked for, where necessary.

In no case will **TRAMO GROUP** sell the personal data of the Data Subject to third parties or use them for undeclared purposes.

6) Personal data storage period (art. 13, §2, letter a of the GDPR).

Unless the Data Subject expresses his/her will to have them removed, the Data Subject's personal data will be stored for as long as they will be needed for the legitimate purposes for which they were collected, in a format that allows the identification of the Data Subject for a period of time not longer than the time necessary to achieve the purposes indicated above.

It should also be noted that, should a user send to **TRAMO GROUP** any data not requested or not necessary for the fulfilment of the performance requested, or for the supply of a service closely related to it, **TRAMO GROUP** will not be considered the Data Controller of those data and will erase them as quickly as possible.

Regardless of the Data Subject's will to have them removed, the personal data will be stored anyhow for the obligations (e.g.: regarding taxation and accounting) that remain to be fulfilled even after contract termination (art. 2220 of the Italian Civil Code); for this purpose the Data Controller will store only the data necessary to that end.

At the end of the storage period, the data you have supplied will be erased or rendered anonymous.

7) Rights of the Data Subject (articles 15 – 21 of the GDPR).

Pursuant to articles 15 and following of the Regulation, the Data Subject has the right to obtain from the Data Controller:

- confirmation as to whether or not his/her personal data is being processed and, in that case, access to his/her personal data;
- the rectification or erasure of the data or a restriction to their use;
- the portability of the data as indicated in art. 20 of the GDPR.

The Data Subject also has the right to object to the processing of his/her personal data.

In order to exercise the above listed rights , the Data Subject may contact the Data Controller at the contact addresses given in item 1) of this Notice.

8) The subjects the Data Subject can lodge complaints with (art. 15 of the GDPR)

Without prejudice to any other legal action for administrative or legal purposes, the Data Subject who believes that the processing of his/her personal data is in breach of the GDPR has the right to lodge a complaint with a supervisory authority, in particular in the Member-State in which the Data Subject resides or habitually works or in the place where the alleged breach has taken place. The Italian supervisory authority is the 'Garante per la protezione dei dati personali' (Data Protection Supervisor).

9) Communication of personal data as a legal or contractual obligation or as a requisite to the signing of a contract; obligation of the Data Subject to provide his/her personal data and consequences possibly deriving from non providing such data.

Your providing your personal data and the ensuing processing by the Data Controller are necessary for the creation, continuation and correct management of the relationship under contract; to this end, personal data provision is mandatory. Your refusal to provide your personal data may result in the impossibility, on the part of the Data Controller, to complete and manage the contract entered into with you.

10) Existence of an automated decision-making process, including profiling.

Pursuant to art. 13, § 2, letter f) of the GDPR, this is to inform you that the personal data collected will not be subjected to any kind of automated decision-making process, including profiling, as per art. 22, §§ 1 and 4 of the Regulation.

11) Processing of personal data for purposes other than that for which they were collected.

Should the Data Controller intend to further process the personal data for a purpose other than that for which they were collected, the Data Controller shall, before performing this further processing, provide to the Data Subject information regarding such different purpose and any further relevant information as per art. 13, § 2 of the Regulation.

12) Updates and changes.

Any update of this Information Notice will be promptly communicated using appropriate means, and any further processing of the Data Subject's personal data by the Data Controller for purposes other than those indicated in the Information Notice will be communicated before such processing takes place and upon the Data Subject's consent to such processing, where required.