

Information on the processing of personal data pursuant to Articles 13 and 14 of EU Regulation No. 679/2016

Foma S.p.A. collects and uses personal data of users when they browse or use online services, including on the website <https://www.foma.it/>.

By personal data we mean any information that can be used to identify you as an individual.

The purpose of this information is to provide you with a clear and detailed explanation of how, when, and why we may collect and use your data. It has been designed to explain in a simple and transparent way our policy on the protection of personal data and to show you how to effectively exercise your rights.

Remember, however, that this Privacy Policy refers only to the processing of personal data carried out by Foma S.p.A. through this website and does not concern third-party websites, platforms, or social network pages, even if they are accessible through links on the Site: in these cases, it is always necessary to refer to the information available on the respective pages.

We also inform you that this information may be subject to changes and variations over time, so we invite you to regularly consult this page to be updated on the processing of personal data carried out by Foma.

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1. Who is the data controller for my data?

Since Foma S.p.A., VAT ID 00550630982, determines the means and purposes of processing personal data involved in the use of this Site, it is the Data Controller.

You can contact the Data Controller by sending a communication to the following addresses:

- by mail: Foma S.p.A., Via John Kennedy n. 20, 25020 - Pralboino (BS), Italy;
- PEC: fomaspa@pec.it;
- E-mail: privacy@foma.it.

2. Who is the Data Protection Officer?

Foma has designated a Data Protection Officer whom you can contact for more information or clarification on the processing activities carried out by the Data Controller or to request assistance in exercising the rights provided for the protection of your personal data (see also sec. 10 that follows). To contact the Data Protection Officer, you can use the addresses indicated for the Data Controller or the following email address: dpo_c@fclex.it.

3. When do you collect my data?

Foma S.P.A. will collect information directly provided by you:

- when you access and browse the website;
- when you send questions or advice through the dedicated sections or contacts;
- when you apply to work with us;
- when you download contents and products files from the website.

4. What data will you process?

When you browse or use services on the Foma website, the following types of data may be processed:

a) Browsing data

When you browse the website, some personal data, defined as "Browsing data", may be processed. These are personal data whose transmission is implicit in the navigation of websites, including but not limited to data traffic and data concerning localization, the weblog, and other communication data for possible billing purposes or concerning the resources you access through your device. These are acquired by computer systems that enable the proper functioning and ensure the security of the Website. Although these pieces of information are not collected to be associated with identified subjects, they could allow the identification of users - by their very nature and through processing and association with data held by third parties. For example, these include the IP addresses or the domain names of the computers used by users who connect to the Website, the unique addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server, and other parameters related to the operating system and the browser used.

- Purpose of the processing: to enable safe and proper use of the Website;
- Legal basis for processing: the legitimate interest of Foma in the proper functioning of the Website and the security of navigation, regularly balanced with the rights of the data subject (Art. 6, para. 1, lit. f, GDPR [General Data Protection Regulation]).

b) Request for information through dedicated sections

You can contact us via the contact forms available on the Website (<https://www.foma.it/en/contact/>) or using the contact details indicated on the Website to request information or assistance, including about individual products/services or to obtain technical information and/or information on the products/services offered; this involves the subsequent acquisition of the data you have communicated to us (name, surname, email address, phone number and the information reported in the communication) and it means that you allow us to send you any response communications using the contact details you provided at the time of the request.

- Purpose of processing: to ensure adequate support in relation to your needs and to respond to your requests;
- Legal basis for processing: the provision of the service you have requested (Art. 6, para. 1, lit. b, GDPR).

c) Work with us

You can contact us to submit your application for open positions at Foma sending an email at curriculum@foma.it for the positions you can find in the "Work with us" section (<https://www.foma.it/en/news/>) and thus authorizing the Data Controller to process personal data for the aforementioned purpose. For this purpose, identifying data (name and surname) and

a contact email address will be requested, and you must share with us a file with your curriculum vitae, as these are information necessary for Foma to assess your proposal for collaboration. The provision of this data is mandatory only for the submission of one's application and therefore it is up to the individual candidate to decide whether to proceed with sending their curriculum vitae: any refusal will result in the inability to use the service, without further consequences. Consent to processing is not necessary, pursuant to Article 111bis of Legislative Decree No. 196/2003 (known as the Privacy Code, as amended by Legislative Decree No. 101/2018) and Article 9, paragraph 2, letter b) of the GDPR, when the processing concerns data contained in resumes spontaneously transmitted by candidates for the potential establishment of an employment/collaboration relationship, even if it involves data falling within the special categories provided by Article 9 of the GDPR (for example, in cases where such data must be known due to the employment relationship being established, particularly regarding the possible inclusion of the candidate in protected categories or the need to carry out pre-employment medical examinations). At the time of any interview, all further information on the processing of their personal data will be provided to the data subject. The data will be stored for the period necessary to evaluate your request and, in any case, for a maximum period of two years. The deletion of the data sent will also be carried out at any time, in case of a specific request from the candidate to the Data Controller.

- Purpose of processing: to provide the service requested by the data subject and to evaluate the application request received for the potential establishment of an employment relationship;
- Legal basis for processing: to execute the contractual relationship of which the data subject is a part (Art. 6, para. 1, lit. b GDPR).

d) Download guides, catalogues and other materials

The User may decide to download guides, catalogues and other materials made available on the website. To this end, no personal data will be requested by the Data Controller, but the User is informed that some information relating to the operation performed may be automatically transmitted to the Data Controller, as provided for in point (a) of this section. Such data will not be used by Foma in any way, except for the automatic computerized recording of the download performed by the User.

- Purpose of processing: to allow users to download the materials made available on the website;
- Legal basis for processing: Foma's legitimate interest in the proper functioning of the Website and the security of navigation, duly balanced with the rights of the data subject (Article 6, paragraph 1, letter f, GDPR).

h) Cookies

What are they? The term cookie refers to a small text file that stores brief information about navigation on a specific internet site, which will be installed on your device when you access it. Each cookie contains various data (e.g., the name of the server from which it comes, a numeric identifier, etc.), can remain in the system for the duration of a session (until the browser is closed) or for long periods and may contain a unique identification code.

When you visit the Website again, they will be sent back to the website that generated them (first-party cookies) or to those provided by third parties who can recognize them (third-party cookies). Foma wants to reassure you about the safety of the cookies on its website: they do not harm your device in any way, but they allow you to navigate faster, offering a better experience.

What are they used for? Cookies are used for different purposes depending on their type: some are strictly necessary for the proper functionality of a website (technical cookies), while others

optimize performance to provide a better user experience or allow the gathering of statistics on the use of the website, such as analytics cookies, or enable the display of personalized advertising, such as profiling cookies.

The Website may use both cookies that do not require your consent for their installation (such as technical cookies) and cookies that require your prior consent to be used (such as profiling cookies). This information is reported in the banner displayed at the opening of the Website and in the cookie settings panel always available on the Website.

In particular, the following can be activated on the Website:

a. Technical cookies (which do NOT require your consent):

These are cookies necessary for the operation of the Website and allow you to access its features (known as navigation cookies) or to authenticate into the session.

There is also the use of functional cookies, which allow the storage of your preferences and settings, thus improving your browsing experience within the Website.

To ensure their functionality, these cookies are usually not deleted upon closing the browser; however, they have a predefined duration (generally up to a maximum of 2 years) and after this period, they deactivate automatically. These cookies and the data collected from them will not be used for any further purposes.

The installation of technical cookies occurs automatically upon accessing the site or to activate certain features (e.g., selecting the "remember me" option). At any time, you can always decide to disable them by changing the settings of your browser; however, this may cause some problems with the display of the Website.

- Pursued purpose: to ensure the correct functioning and security of the Website;
- Legal basis for processing: the legitimate interest of Foma in the correct functioning and security of navigation, regularly balanced with the rights of the data subject (art. 6, paragraph 1, letter f, GDPR).

b. Analytical cookies (which do NOT require your consent if anonymized):

These cookies track the choices made on the Website and data related to users' online navigation (for example, pages viewed, time spent on a page, etc.), in order to perform statistical analyses, usually in an anonymous and aggregated form. If users can be tracked and identified through these analyses, these tools can only be used with the user's express consent. However, when the following circumstances occur:

- the IP address has been properly anonymized;
- the information obtained with analytical cookies refers to a single computing resource (Website, app, etc.) and is used only in an anonymous and aggregated form;
- the cookie provider does not combine the information with other processing and does not transmit it to third parties,

the complete anonymization of the data collected is ensured, and even cookies in this category can be activated without the need for user consent, precisely because the data processed cannot be linked to any identifiable user.

- Purpose of processing: to have statistics on user behaviour on the Website, based on aggregated and anonymized data.
- Legal basis for processing: depending on the case:
 - the legitimate interest of Foma in optimizing the performance of the Website and improving the services provided through the Website, regularly balanced with the rights of the data subject (art. 6, paragraph 1, letter f, GDPR);

- the user's consent (art. 6, paragraph 1, letter a, GDPR), freely given and revocable at any time, through the cookie banner or by following the instructions provided below and in the Cookie Policy available on the Website.

c. Profiling and marketing cookies (which require your CONSENT):

This site may also use profiling and third-party cookies, the installation of which is subject to your prior consent given through the banner or also managed at any time through the Cookie Policy available on the Website.

Profiling cookies can include different categories, including advertising profiling, retargeting, or social cookies.

- *Advertising profiling cookies:* create a user profile that allows the display of advertising content in line with the preferences expressed during navigation on the Website;
- *Retargeting cookies:* are created to send you advertising content related to products you have purchased or viewed on the Website and towards which you have shown interest;
- *Social cookies:* this Website provides for the installation of cookies related to social network plugins. These cookies are managed directly by third parties and allow the display of advertising messages in line with your preferences.

When you access the Website, through a specific banner, you will be informed about the presence of profiling and retargeting cookies and, through it, you can consent or not to their installation, possibly selecting the individual cookies you want to install.

At any time, you can still revoke the consent previously given, without affecting the possibility of visiting the site and enjoying the related content.

The installation of profiling, retargeting, analytical, and social cookies, including any other activity connected to them, is managed through third-party services. For more information and to activate or deactivate these cookies, you can access the disclosures made directly by the third-party companies: the relevant list is available in our Cookie Policy.

The user is informed both through the brief information (banner displayed until consent is given or denied and always modifiable by clicking on the appropriate icon present on all pages of the Site) and through our Cookie Policy, which we invite you to read carefully for all other information on the cookies used on the Website and for information on their disabling.

- Purpose of processing: analyse the browsing behaviour of the user to present personalized advertising;
- Legal basis for processing: the user's consent (art. 6, paragraph 1, letter a, GDPR), freely given and revocable at any time, through the cookie banner or following the directions provided below and in the Cookie Policy available on the Website.

d. Social Media Plugins

On the Website, there are some buttons that redirect the user to the Website Controller's profiles on social networks. Only following a click on these buttons, some cookies for marketing and profiling purposes may be activated by the third parties managing the social networks. The Controller does not directly manage these tools, but informs you that by using the website's functionalities, they may be activated. For more information, including how to disable such cookies, we invite you to read the data processing policies of the social networks:

- *LinkedIn:* <https://it.linkedin.com/legal/privacy-policy>
- *Facebook:* <http://www.facebook.com/policy.php>
- *YouTube:* <https://policies.google.com/privacy?hl=it>
- *Instagram:* <https://help.instagram.com/519522125107875>

- *Twitter:* <https://twitter.com/it/privacy>

Disabling via browser

We inform you that from the site <http://www.youronlinechoices.com/it/> it is not only possible to acquire more information about cookies but also to check the installation of numerous cookies on your browser/device and, where supported, to disable them.

Commonly used browsers (e.g., Internet Explorer, Firefox, Chrome, Safari) accept cookies by default, but this setting can be changed by the user at any time. This is true for both PCs and mobile devices such as tablets and smartphones: it is a function generally and widely supported. Therefore, cookies can easily be deactivated or disabled by accessing the options or preferences of the browser used and generally, third-party cookies can also be blocked; in general, such options will have effect only for that browser and on that device, unless options to unify preferences across different devices are active. Specific instructions can be found on the options or help page of the browser itself.

However, disabling technical cookies may affect the full and/or proper functioning of various sites, including this Website.

Typically, the browsers currently used:

- offer the "Do not track" option, which is supported by some websites (but not all). In this way, some websites may no longer collect certain navigation data;
- offer the option of anonymous or incognito browsing: in this way, data will not be collected in the browser, and the browsing history will not be saved, but navigation data can still be obtained by the operator of the website visited;
- allow the deletion of cookies stored in whole or in part, but upon a new visit to a website, cookies are typically installed unless this possibility is blocked.

Below are links to the support pages of the most widely used browsers (with instructions on disabling cookies on these browsers):

- Firefox (<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>);
- Microsoft Edge (<http://windows.microsoft.com/en-us/internet-explorer/delete-managecookies#ie=ie-11>);
- Safari (iOS) (<https://support.apple.com/en-us/HT201265>);
- Chrome (desktop: <https://support.google.com/chrome/answer/95647?hl=en> ; Android and iOS <https://support.google.com/chrome/answer/2392971?hl=en>).

5. For what additional purposes might you use my data?

Your personal data may also be used for the purposes of:

- a) complying with legal obligations and requests from public or government authorities;
- b) managing any disputes or contentions and thus defending the rights of Foma S.p.A., both judicially and extra-judicially.

In these cases, the legal bases for processing will be:

- for point a), compliance with a legal obligation;
- for point b), the legitimate interest of the Data Controller in protecting its rights, provided they are adequately balanced, from time to time, with the rights of the data subject.

6. With whom will you share my data?

In accordance with the purposes indicated in the previous section, the staff of Foma will be assigned to process your data, in order to provide you with the services, information, or support requested. Access to your personal data will always be expressly authorized by the Data

Controller, who also identifies external parties to whom it turns for the provision of services and for activities within its competence, specifically designated as Data Processors pursuant to Article 28 of the GDPR.

We remind you that the list of data processors is available from the Data Controller, from whom you may request it using the contact details indicated above.

User data will not be transferred to third parties except in cases where the nature of the services rendered requires it, or in cases where, by virtue of a legal obligation or in the presence of a legitimate interest, the Data Controller needs to communicate them to the competent jurisdictional or supervisory authorities.

7. How will you process my data?

Your personal data will also be processed with the help of electronic means for the time strictly necessary to achieve the purposes intended with the collection.

Foma S.p.A. will adopt the most appropriate technical and organizational measures to reduce the risks of loss, illicit or incorrect use of data, and to prevent any unauthorized access by third parties. Therefore, Foma S.p.A. will ensure the security of your personal data, limiting the number of subjects who will be allowed access to the servers or databases and arranging appropriate protection systems aimed at limiting the risk of cyber-attacks.

8. Where are the data processed?

The data processed by Foma are located on servers situated in Italy, provided by Serverplan S.r.l. unipersonale, P.IVA 02495250603.

However, some providers of cookie services are also based in countries outside Europe, particularly in the United States, as is also specifically mentioned in our Cookie Policy.

In these cases, personal data may also be transferred to servers located in the United States: in these instances, compliance with the guarantee measures provided for and required by the adequacy decision adopted by the European Commission on July 10, 2023, relating to personal data transferred from the EU to US companies and their adoption by the relevant provider will always be verified. All necessary precautions will be taken to ensure the best possible protection of personal data based on such transfer: a) on adequacy decisions of third countries expressed by the European Commission; b) on adequate guarantees expressed by the third-party recipient pursuant to Art. 46 of the Regulation; c) on the adoption of binding corporate rules, known as Corporate binding rules, and in particular, by preparing technical and computer security measures that protect personal data and the rights of the data subjects, as provided for by the GDPR and European legislation.

9. How long will you keep my data?

Foma will process your personal data for the time reasonably necessary to achieve the purposes previously listed, available in the section "*What data will you process?*" or for the retention terms provided by each sector-specific regulation.

For the terms of cancellation of the data processed through cookies you can find the information in our Cookie Policy.

In any case, at the end of the retention period, your personal data will be deleted or made irreversibly anonymous.

10. Links to third party websites

This Website may contain links to and from the websites of our partners, as well as to advertisers and social networks. Please note that the Data Controller assumes no responsibility for any personal data that may be collected through these sites and the use of their services and that, if

the user follows a link to any of these websites, they are invited to consult the privacy policies provided by each external entity with respect to the Website.

11. What are my rights and how can I protect my privacy?

In relation to your personal data and in accordance with the provisions of the GDPR, Foma S.p.A. informs you that you have the right to request:

- access to your data;
- the modification and rectification of any errors in our database concerning your data;
- the deletion of your data if held without legal grounds;
- the restriction of processing of your data;
- objection to the processing of your data;
- the portability of your data.

Further models and more information are also available here:

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1089924> .

In the following table, we illustrate in detail how to exercise your rights:

YOUR RIGHT	HOW CAN YOU EXERCISE IT?
Access	You can request to: <ul style="list-style-type: none"> • Ask for confirmation whether your personal data is being processed; • Obtain a copy of your data; • Provide other information about your personal data that is not already included in this information notice.
Rectification	You can request the rectification of inaccurate or incomplete personal data . Before proceeding with the rectification, we will verify the accuracy of the data in our records.
Deletion/ Right to be Forgotten	You can request the deletion of your personal data , but only if: <ul style="list-style-type: none"> • Their retention is no longer necessary in relation to the purposes for which they were collected; • You have withdrawn your previously given consent (where processing is based on consent); • The processing has been carried out unlawfully; • It is necessary to comply with a legal obligation to which Foma S.p.A. is subject (in relation to an order from an Authority).
Restriction	You can request to restrict your personal data, but only if: <ul style="list-style-type: none"> • Their accuracy has been contested; • They are no longer necessary for the purposes for which they were collected, but there is an ongoing legal dispute regarding their use; Following your request for restriction, the use of your personal data is however permitted when: <ul style="list-style-type: none"> • Your consent still exists; • It is necessary to establish, exercise, or defend legal claims; • To protect the rights of another natural or legal person involved in the processing.

Portability	You can request a copy of your personal data in a structured, commonly used, and machine-readable format.
Objection	<p>You can object at any time to the processing of personal data concerning you when:</p> <ul style="list-style-type: none"> • the legality of the processing is based on the legitimate interest of the data controller; • the personal data is processed for direct marketing purposes including profiling to the extent that it is related to such direct marketing. <p>When you object:</p> <ul style="list-style-type: none"> • to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes; • in the case of the legitimate interest of the controller, processing may continue only if the controller demonstrates compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defense of legal claims. <p>It is possible to exercise the right to object also through automated means using specific techniques, such as those made available on the website in the personal page and in emails (unsubscribe link).</p>

Foma S.p.A. guarantees that a response to any request regarding your rights will be provided within thirty days of its receipt.

12. Complaints

Data subjects can file a complaint when the processing carried out by Foma S.p.A. does not comply with the provisions of European Regulation No. 679/2016 and national legislation and falls within the cases of violation of their rights, as provided by such legislation.

In Italy, the competent authority is the **Italian Data Protection Authority**, whose contact details are available at <http://www.garanteprivacy.it/>.

More information and the sample document to be used for the complaint are available here:

<https://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/4535524>

Furthermore, if the conditions provided by Articles 78 and 79 of the GDPR exist, you have the right to lodge a complaint with the competent judicial authority.

13. Updates

The information we are providing now may change over time, as the processing activities, the data collected, or when there are legislative or regulatory changes, or due to technological advancements. Therefore, we recommend that you periodically consult this Privacy Policy, always updated on this page.