	PRIVACY MANAGEMENT SYSTEM		
Document type:	GENERAL PRIVACY DOCUMENT	DP05	Rev.01
Subject:	**INFORMATION ON THE PROCESSING OF CUSTOMERS' PERSONAL DATA** Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)	November 2025	

Pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter, GDPR), ATP Environment S.r.l., in its capacity as Data Controller, provides the following information to ensure the utmost transparency on how customers' personal data, collected while establishing and managing the contractual relationship, will be processed.

DATA CONTROLLER	ATP Environment S.r.l. Via Camisana, 244 36040 - Torri di Quartesolo (VI) Phone: +39 0444 380221 e-mail: amministrazione@atpenvironment.com Certified e-mail (PEC): atpenvironmentsrl@pec.it

PERSONAL DATA PROCESSED

The Data Controller may process the following data, for the purposes set out herein:

- The Customer (or potential Customer) and its company representative's personal identification and contact info and data, such as: name, surname, role/position, company or business name, registered office, telephone number, e-mail address acquired directly or at trade fairs, events or professional meetings, also by means of business cards;
- Tax and bank data (e.g. tax code, VAT number, IBAN).

PURPOSES OF THE PROCESSING	**LEGAL BASIS OF THE PROCESSING**
Personal data are processed for the following purposes: a) To fulfil pre-contractual and contractual obligations, such as acquiring information prior to the contract conclusion, draft quotes, and to manage orders, shipments and invoicing. b) To fulfil legal obligations including those of an administrative, accounting, civil and tax nature. c) To establish a professional first contact or handle contact and information requests, received by e-mail, phone call or business cards, during trade fairs, events or professional meetings. a) If needed, to establish, exercise and/or defend a right in judicial, administrative, arbitration or conciliation proceedings.	The legal basis legitimising the data processing can be found: • For the purposes set out in (a), in the fulfilment of pre-contractual and contractual obligations, pursuant to Article 6(1,b) of the GDPR. • For the purposes set out in (b), in the fulfilment of legal obligations the Data Controller is subjected to, pursuant to Article 6(1,c) of the GDPR. • For the purposes set out in (c), in the Data Controller's legitimate interest in handling business contacts, information requests and pre-contractual activities, pursuant to Article 6(1,f) of the GDPR. • For the purposes set out in (d), in the Data Controller's legitimate interest in protecting its rights before judicial or quasi-judicial courts, pursuant to Article 6(1,f) of the GDPR.

As provided for in Article 130(4) of Legislative Decree 196/03, the Controller may send its customers commercial communications concerning products or services similar to those already purchased, without the need to obtain their consent (so-called soft spam). The Data Subject has the right to object at any time. Outside of this, the Company does not engage in other marketing activities. Any future promotional communications, not falling under "soft spam", will only be sent with the Data Subject's consent.

DATA PROVISION	Provision of personal data is necessary for the negotiation, establishment, management and execution of the contractual relationship with the Customer. Failure to provide the requested data, in whole or in part, may result in the impossibility for the Data Controller to carry out any pre-contractual or contractual activities, and to fulfil the related legal obligations.

RETENTION PERIOD	Contractual data shall be processed for the entire duration of the contractual relationship, and for 10 years after its termination, to fulfil all related legal obligations. Data collected at trade fairs, events or as a result of a contact request shall be retained for the time strictly necessary to handle the request and provide feedback, and, in any case, no longer than 24 months after the last contact, unless a contractual relationship is established, in which case the retention periods set out above shall apply. In the event of judicial or quasi-judicial litigation, personal data shall be retained for the duration of the litigation and until the time limit for appeals is exhausted.

PROCESSING METHODS	Personal data shall be processed both on paper and digital/electronic tools, adopting appropriate technical and organisational measures to guarantee their confidentiality, security and integrity. Personal data will be stored in our internal management systems and in a cloud-based Customer Relationship Management ('CRM') system. The processing will be carried out in full compliance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality, as set out in Article 5 of the GDPR. Personal data will not be subject to automated decision-making processes, nor to profiling activities.

DATA RECIPIENTS	The Data Controller shall process personal data through its internal staff, previously authorised and adequately trained, in accordance with Article 29 of the GDPR. The following categories may also have access to the data: • Third parties carrying out outsourced activities on behalf of the Data Controller, in their capacity as Data Processors, pursuant to Article 28/GDPR, such as, by way of example, legal, accounting and tax consultants, IT service providers, company software suppliers, CRM. • Entities acting as independent data controllers, such as, for instance, credit institutions, credit recovery institutions, entities or subjects to which data must be disclosed by law, or public or private entities following inspections or audits. The updated list of persons appointed as data processors is made available for consultation at the request of the Data Subject. The data shall not be disseminated.

DATA TRANSFER	Although the personal data processed are stored on servers and data centres located within the European Union, the Data Controller resorts to certain tools and services (e.g. cloud platforms, management applications, CRM) that may involve the transfer of data to non-EU countries. In such cases, the transfer will take place exclusively to suppliers operating in countries the European Commission has deemed adequate, pursuant to Article 45 of the GDPR, or to entities that provided adequate guarantees pursuant to Article 46 of the GDPR, ensuring a level of protection of personal data equivalent to that provided for by European legislation.

DATA SUBJECT'S RIGHTS	At any time, the Data Subject may exercise, where applicable, the rights set out in Articles 15 et seq. of the GDPR, and namely: a) Obtain confirmation as to whether or not their personal data are being processed and, if so, access such data and all related information; b) Request any inaccurate data to be rectified and any incomplete data to be supplemented; c) Obtain the deletion of data or a processing restriction; d) Receive personal data in a structured, commonly used and machine-readable format (right to portability); e) Object to the processing for legitimate reasons. Any requests to exercise these rights may be sent to the Data Controller by registered letter with acknowledgement of receipt, addressed to: ATP Environment S.r.l. - Via Camisana, 244 - 36040 - Torri di Quartesolo (VI), or by e-mail at amministrazione@atpenvironment.com or by certified e-mail (PEC) at atpenvironmentsrl@pec.it Moreover, the Data Subject has the right to lodge a complaint with the Supervisory Authority for the Protection of Personal Data, pursuant to Article 77 of the GDPR, should they deem the processing of their personal data to be in breach of the provisions of the GDPR, and to take legal action pursuant to Articles 78 and 79 of the GDPR.