PRIVACY POLICY - PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA of users interacting with the website of Made in Steel S.r.l.

Pursuant to Regulation (EU) 2016/679 (hereinafter the "**Regulation**" or "**GDPR**") and Legislative Decree No. 196/2003 (hereinafter collectively referred to as the "**Applicable Legislation**"**),** this document describes the general methods used to process the personal data of users, as well as any personal data of third parties provided by users, including employees, agents, representatives or collaborators, who interact with the website of Made in Steel S.r.l., accessible at **www.madeinsteel.it** (hereinafter the "**Website**").

This privacy notice also applies to natural persons acting as sole traders, small business owners or professionals, as well as natural persons acting on behalf of companies or other entities.

This information does not apply to other websites, pages or online services accessible through hyperlinks that may be published on the Website and refer to resources outside the above-mentioned domain, except for processing activities carried out on behalf of the Data Controller through external platforms expressly referred to in this privacy notice.

Personal data are processed in compliance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality. Specific security measures are adopted to prevent the loss of personal data, unlawful or improper use and unauthorised access.

This privacy notice does not constitute a request for consent. Accessing the Website or consulting this privacy notice does not constitute consent to processing activities for which consent is required.

DATA CONTROLLER

The Data Controller is **Made in Steel S.r.l.**, Tax Code and VAT Number **03608030171**, with registered office at **Via Don Milani 5 – 25020 Flero (BS), Italy**, which can be contacted at the following addresses:

Telephone: +39 030 2548520;

Email: info@madeinsteel.it;

Certified email (PEC): madeinsteel@legalmail.it.

Hereinafter referred to as the "Data Controller".

DATA PROTECTION OFFICER

Data subjects may contact the Data Protection Officer (DPO), **Attorney Alessandro Donati**, regarding matters relating to the processing of their personal data and the exercise of their rights:

Email: alessandro.donati@studiogoriominervini.it;

Certified email (PEC): alessandro.donati@brescia.pecavvocati.it;

Telephone: +39 030 47502.

The right to lodge a complaint with the Supervisory Authority is separate from the possibility of contacting the Data Controller or the DPO.

CATEGORIES OF PERSONAL DATA PROCESSED, PURPOSES AND LEGAL BASES FOR PROCESSING

Browsing data

The IT systems and software procedures used to operate the Website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected for the purpose of associating it with identified data subjects, but, by its very nature, could make it possible to identify users through processing and association with other data held by third parties.

This category includes the IP addresses or domain names of the computers used by users connecting to the Website, the URI addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server response and other parameters relating to the user's operating system and IT environment.

These data, which are necessary for the use of web services, are processed on the basis of the Data Controller's legitimate interest, pursuant to Article 6(1)(f) of the GDPR, in ensuring the operation and security of the Website, for the purposes of:

- obtaining statistical information on the use of the services;
- monitoring the proper functioning of the services offered.

This processing does not include the use of tracking tools subject to consent, which are governed by the following section.

Browsing data are not retained for more than seven days and are deleted immediately after aggregation, except where required by the judicial authorities for the investigation of criminal offences.

Cookies and other tracking systems on the Website

Technical cookies are used on the Website to ensure its proper functioning and enable browsing, and do not require the user's consent.

Analytics and profiling cookies, where present and subject to consent, are used only after obtaining the user's consent, in accordance with Article 122 of Legislative Decree No. 196/2003 and, with regard to the related processing of personal data, Article 6(1)(a) of the GDPR.

The characteristics of the tools used, their purposes, duration and any access to information by third parties are described in the separate Cookie Policy. Users may change their preferences and withdraw their consent through the cookie management tool made available on the Website, as well as by adjusting their browser settings.

For further information: https://www.madeinsteel.it/it/cookie-policy.

Data voluntarily provided by users

Apart from what has been specified regarding browsing data, users are free to provide personal data to request information, documents or other communications, including through forms available on the Website or on linked external platforms, such as the MailUp/Emailsp platform.

By way of example, data may be collected through:

1. Forms for subscribing to the Data Controller's mailing list, for updates, news and events relating to the Made in Steel trade fair, which may include first name, surname and email address;
2. Forms for submitting expressions of interest in exhibiting at the trade fair, which may include first name, surname, company name, country, telephone number, email address and preferences regarding the stand or exhibition space.

Data voluntarily provided are processed for the following purposes:

- **Management of requests, expressions of interest and contractual relationships**: performance of a contract to which the data subject is a party or pre-contractual measures taken at their request, pursuant to Article 6(1)(b) of the GDPR. Where the data subject acts as the contact person for a company or other entity, the processing of their professional contact details is based on the Data Controller's legitimate interest in managing requests and the relationship with the organisation represented, pursuant to Article 6(1)(f) of the GDPR;
- **Compliance with legal obligations**: Article 6(1)(c) of the GDPR;
- **Sending commercial communications by email relating to products or services similar to those already provided**: within the limits and under the conditions laid down in Article 130(4) of Legislative Decree No. 196/2003, on the basis of the Data Controller's legitimate interest, pursuant to Article 6(1)(f) of the GDPR, in promoting similar services to its existing customers. Data subjects may object free of charge when their email address is collected and on the occasion of each communication;
- **Sending newsletters, promotional material and communications relating to initiatives, conferences, meetings and other marketing activities not covered by soft spam**: consent of the data subject, pursuant to Article 6(1)(a) of the GDPR.

Failure to consent to promotional activities does not prevent users from submitting requests or expressions of interest or using services that do not require such consent.

The voluntary sending of messages to the contact addresses and the completion of forms entail the collection of the data necessary to respond to requests and manage the services requested.

The Data Controller does not request, through these channels, data belonging to the special categories referred to in Article 9 of the GDPR. Users are invited not to include information of this nature unless strictly necessary for their request.

Where users provide personal data relating to other persons, they must be entitled to disclose such data and must make this privacy notice available to those persons. The Data Controller's information obligations under the Applicable Legislation remain unaffected.

Absence of tracking pixels and click tracking in email communications

In compliance with the principles of data minimisation and data protection by design and by default (Article 25 of the GDPR), as well as in accordance with Article 122 of Legislative Decree No. 196/2003 and the Guidelines of the Italian Data Protection Authority set out in Decision No. 284 of 17 April 2026, the Data Controller informs users that **tracking pixels are disabled and are not used, nor are any systems used to track clicks on links contained in email communications sent to users** (including newsletters, promotional communications and service communications).

Consequently, the Data Controller does not carry out any monitoring — either on an individual basis or on an aggregated statistical basis — of whether email messages have been opened or whether recipients have interacted with the links contained therein.

METHODS OF PROCESSING AND DATA RETENTION

The Data Controller does not adopt fully automated decision-making processes that produce legal effects concerning data subjects or similarly significantly affect them, within the meaning of Article 22 of the GDPR.

Personal data are processed using electronic and/or paper-based means and are retained for no longer than is necessary to achieve the purposes for which they were collected.

In particular:

- Data processed for contractual purposes are retained for the period necessary to fulfil contractual and legal obligations and, as a rule, for **10 years from the termination of the contract**, without prejudice to longer retention obligations or the need to protect rights in the event of disputes;
- Data collected to assess the possibility of entering into a contract, where the contract is not concluded, are deleted within **12 months**;
- Data processed for promotional purposes on the basis of consent are retained until consent is withdrawn and, in any event, for no longer than **24 months from collection or the most recent renewal of consent**. Upon expiry, unless consent is renewed, data processed exclusively for this purpose are deleted within 30 days. In the event of early withdrawal of consent, communications cease and data processed exclusively for this purpose are deleted within 30 days;
- Data used for soft spam are retained for as long as the commercial relationship continues or there remains an interest in offering similar services, with periodic verification of the need to retain them and cessation of their use for promotional purposes in the event of an objection.

This is without prejudice to processing necessary for other lawful purposes and the retention of information strictly necessary to document consent and comply with withdrawals of consent or objections.

The provisions of the relevant section apply to browsing data.

The Data Controller adopts appropriate technical and organisational measures and applies the principles of data protection by design and by default, keeping email open and click tracking functionalities disabled on email sending platforms.

Use of MailUp/Emailsp

To provide and manage the communications and news service relating to the Made in Steel trade fair and to collect and manage expressions of interest in exhibiting, the Data Controller uses the services of Mailup S.p.A., including through the Emailsp platform, acting as a Data Processor pursuant to Article 28 of the GDPR.

The legal bases remain those indicated in the preceding sections: consent for promotional communications, legitimate interest in cases of soft spam permitted by law, and contractual or pre-contractual grounds for requests submitted by users, subject to the clarifications provided for contact persons representing companies or entities.

Use of the platform is limited to the management of contact lists and the technical sending of communications, with email open monitoring functionalities (tracking pixels) and click tracking functionalities disabled.

Further information on the provider's services is available at https://www.mailup.it/gdpr-mailup/; this reference does not replace this privacy notice.

Failure to provide the necessary data may prevent the Data Controller from responding to a request or providing the requested service. The provision of data for promotional purposes is optional.

Recipients may stop receiving promotional communications by using the unsubscribe link included in each communication or by contacting the Data Controller or the DPO.

RECIPIENTS OF PERSONAL DATA

Personal data are processed by the Data Controller's internal staff and collaborators, who are duly authorised and instructed.

They may also be disclosed, to the extent necessary for the stated purposes, to the following categories of recipients:

- Data Processors, including Mailup S.p.A., and any sub-processors, in compliance with Article 28 of the GDPR;

- Providers of email sending and management services and related technologies, exclusively for the sending of messages and management of distribution lists, excluding email open and click tracking activities;
- Hosting providers, including Amazon Web Services, and parties providing technical coordination, support and maintenance of IT systems;
- Legal, tax and accounting professionals and other consultants, to the extent necessary for the services provided;
- Competent authorities, in cases provided for by law.

The roles of the parties involved are determined according to the activities actually performed. Providers processing data on behalf of the Data Controller operate on the basis of agreements and instructions compliant with Article 28 of the GDPR.

An up-to-date list of Data Processors may be requested from the Data Controller.

The personal data covered by this privacy notice are not subject to public disclosure.

TRANSFERS TO THIRD COUNTRIES

Personal data may be processed within the European Union and, where necessary, transferred to countries outside the European Economic Area exclusively in compliance with Chapter V of the GDPR.

Transfers take place:

- On the basis of an adequacy decision adopted by the European Commission, pursuant to Article 45 of the GDPR; or
- Where appropriate safeguards are in place pursuant to Article 46 of the GDPR, including Standard Contractual Clauses and, where necessary, supplementary measures.

Data subjects may obtain information on transfers and a copy of the applicable safeguards by contacting the Data Controller or the DPO.

RIGHTS OF DATA SUBJECTS

In the cases and within the limits provided for by the GDPR, data subjects have the following rights:

- **Right of access**: to obtain confirmation as to whether personal data concerning them are being processed, to access such data and to receive a copy thereof;
- **Right to rectification**: to obtain the correction of inaccurate data and the completion of incomplete data;
- **Right to erasure**: to obtain the erasure of data in the cases provided for by Article 17 of the GDPR;
- **Right to restriction of processing**: to obtain the restriction of processing in the cases provided for by Article 18 of the GDPR;
- **Right to data portability**: to receive the data provided to the Data Controller in a structured, commonly used and machine-readable format, where processing is based on consent or a contract and is carried out by automated means, and to request their direct transmission to another controller, where technically feasible;
- **Right to object**: to object, on grounds relating to their particular situation, to processing based on legitimate interest. The Data Controller shall cease processing unless it demonstrates compelling legitimate grounds that override the interests, rights and freedoms of the data subject, or unless processing is necessary for the establishment, exercise or defence of legal claims;

- **Right to object to direct marketing**: to object at any time, free of charge and without having to provide reasons, to the processing of personal data for direct marketing purposes, including soft spam;
- **Right to withdraw consent**: to withdraw consent at any time, as easily as it was given, without affecting the lawfulness of processing carried out before withdrawal;
- **Right to lodge a complaint**: to lodge a complaint with the competent Supervisory Authority.

Requests may be submitted to the Data Controller or the DPO using the contact details provided above, preferably specifying the right that the data subject wishes to exercise. No particular formalities are required.

The Data Controller shall respond without undue delay and, in any event, within one month of receipt. This period may be extended by a further two months, where necessary in view of the complexity or number of requests, provided that the data subject is informed of the extension and the reasons for it within the first month.

In Italy, the competent Authority is:

Italian Data Protection Authority (Garante per la protezione dei dati personali)

Piazza Venezia, 11 – 00187 Rome

www.garanteprivacy.it

Data subjects may also lodge a complaint with the competent Supervisory Authority of the Member State in which they habitually reside, work or in which the alleged infringement occurred, pursuant to Article 77 of the GDPR.

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The provisions of this section do not limit the Data Controller's obligations or the rights of data subjects concerning the protection of personal data.

DATE OF LAST REVISION: 22 October 2026