





**INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA RELATED TO  
CONTRACTS WITH CUSTOMERS  
IN ACCORDANCE WITH EU REGULATION 2016/679 ("GDPR")**

	<b>DATA CONTROLLER</b>	Ariston Thermo USA LLC Tax Number: _____ VAT Number: _____ ("Company").
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	<b>DATA PROCESSING PURPOSES</b>		<b>LEGAL BASIS FOR PROCESSING DATA</b>		<b>DATA RETENTION PERIOD</b>
	Purposes relating to establishing and executing the contractual relationship between the Customer and the Company.		Execution of the contract with regard to data on legal representatives.  Legitimate interest with regard to data on Customer employees/consultants involved in contract activities.		Contractual term and, after expiry, for the standard limitation period of 10 years.
	Participation in any loyalty programs and/or recording of data in the Company's CRM		Performance of a contract to which the data subject is a party		Contractual term and, after expiry, for the standard limitation period of 10 years.
	Carrying out administrative and accounting tasks - such as accounting and treasury management, as well as invoicing (for example, checking and recording invoices), in compliance with the requirements of current legislation.		Need to comply with a legal obligation to which the Company is subject.		Retention period required by law (10 years for administrative and accounting purposes)
	Out-of-court debt recovery		Legitimate interest (legal protection)		In case of litigation, for the entire duration of the same, until the time limit for appeal has expired.
	If necessary, in order to establish, exercise or defend the rights of the Data Controller in legal proceedings		Legitimate interest (legal protection)		
	Marketing purposes (sending commercial/promotional communications), by means of automated contact methods (such as text messages, mms, e-mail, social networks, instant messaging apps) and traditional methods (such as telephone calls with operators and traditional mail) on the Company's products/services, reporting of company events as well as customer satisfaction surveys, market surveys and statistical analyses.		Consent of Customer legal representative (which is optional and can be withdrawn at any time).		Personal data and contact data: until revocation of consent
Once the aforementioned retention period has lapsed the data will be destroyed or made anonymous					

<b>DATA PROVISION</b>
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Personal and contact data are mandatory for the conclusion of the agreement



**DATA RECIPIENTS**

The data may be processed by external parties operating as data controllers such as, by way of example, supervisory and control authorities and, in general, public or private parties entitled to request the data. The data may be communicated to public notaries and law firms as well as to accountants.

The data may also be processed, on behalf of the Company, by external parties designated as processor, who are given adequate operating instructions. These subjects are essentially included in the following categories:

- a. Companies offering email services;
- b. companies offering website maintenance services;
- c. companies offering support in carrying out market research.
- d. companies and agencies in the field of event management and trade fairs
- e. companies that offer services instrumental to the pursuit of the purposes set out in this information notice (media agencies, IT suppliers, freight forwarders, softwarehouse & system integrators, e-commerce companies, consulting companies, etc.);
- f. companies offering call center and customer care services;
- g. information provider companies;



**SUBJECTS AUTHORIZED TO PROCESSING DATA**

Data may be processed by employees in company departments who are responsible for carrying out the activities outlined above and have been authorized to process the data and have received suitable operating instructions.



**PERSONAL DATA TRANSFERS OUTSIDE THE EU**

The data may be transferred abroad to non-European countries whose level of data protection has been deemed appropriate by the European Commission pursuant to art. 45 of the GDPR.

Whether such data will be transferred to non-European countries whose level of data protection has not been deemed appropriate by the European Commission, will be applied the Standard Clauses in compliance with European Commission dated February 5th, 2010.

DPO

**DATA PROTECTION OFFICER (DPO)**

Data Protection Officer (“DPO”) appointed by Data Controller pursuant to Art. 37 and following of the GDPR is Mr. Gabriele Faggioli.

It is possible to contact the Data Protection Officer (“DPO”) via e-mail at: [DPO.AristonThermoGroup@aristonthermo.com](mailto:DPO.AristonThermoGroup@aristonthermo.com)





**DATA SUBJECTS' RIGHTS- COMPLAINT TO THE SUPERVISORY BODY**

By contacting ARISTON THERMO USA LLC via mail address to [redacted], via e-mail sent to [privacy.aristonthermo@aristonthermo.com](mailto:privacy.aristonthermo@aristonthermo.com), data subjects can ask the Company for access to personal data, or the correction or deletion of personal data, and also have the right to restrict processing of the data in the cases set out in article 18 of the GDPR, and object to processing in the case of legitimate interests of the controller.

Furthermore, in the case where processing is based on consent or a contract and carried out with automated tools, data subjects have the right to receive the personal data in a structured, commonly used and machine-readable format, and to transmit the data to another data controller without obstruction.

	<p>Data subjects have the right to lodge a complaint to the competent Supervisory Authority in the member state where they are resident or where they work, or the member state where the alleged breach took place.</p> <p>Data subjects have the right to withdraw consent at any time in relation to data processed for marketing purposes, and object to data being processed for these purposes. Data subjects have the possibility of stating a preference for being contacted for the aforementioned purposes through conventional methods and objecting to receiving communication through automatic methods only.</p>
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	<p><b>INFORMATION NOTICE ACKNOWLEDGEMENT</b></p>
	<p><i>By signing this document, I hereby confirm that I have received and read the information on Privacy.</i></p> <p><i>Place _____ date _____</i></p> <p><i>Stamp &amp; Signature _____</i></p>

	<p><b>DATA SUBJECT DECLARATION OF CONSENT</b></p>
	<p>I have read the Privacy Policy above, aware that my consent is purely optional, as well as revocable at any time</p> <p>a. I give my consent to the processing of my personal data by ARISTON THERMO USA LLC for the purposes of direct marketing indicated above: sending of commercial/promotional communications, by means of automated contact methods (such as SMS, MMS, e-mail, social networks, instant messaging apps) and traditional methods (such as telephone calls with operators and traditional mail) on the products and services of ARISTON THERMO USA LLC, reporting of company events, measuring the degree of customer satisfaction, as well as carrying out market surveys and statistical analyses.</p> <p><input type="checkbox"/> I CONSENT                      <input type="checkbox"/> I DO NOT CONSENT</p> <p>b. I consent to the automated processing of my personal data, including profiling, carried out to analyze my preferences, habits, interests and then in order to receive personalized commercial communications / targeted promotional actions / services appropriate to my needs / preferences / suggestions on other products potentially interesting to me based on the products I have previously purchased</p> <p><input type="checkbox"/> I CONSENT                      <input type="checkbox"/> I DO NOT CONSENT</p> <p>place _____ date _____</p> <p>Signature _____</p>