



INFORMATION NOTICE

pursuant to art. 13 Reg. 679/2016 UE

for newsletter subscription

Summary Information

Dear User,

the purpose of this privacy notice is to provide maximum transparency regarding the processing of information you may provide by giving your consent to subscribe to our newsletter.

In compliance with the obligations arising from national legislation (Legislative Decree No. 196 of 30 June 2003 – the Personal Data Protection Code, as amended) and European legislation (EU Regulation 679/2016 – GDPR), **P.F.B. S.r.l.**, with registered office at Via Raimondo dalla Costa no. 690, Modena (MO), VAT/Tax Code No. 00158620369, PEC: pfbmodena@legalmail.it, e-mail: privacy@pfb.it, as Data Controller, has prepared and updates this notice in order to respect and protect your privacy, undertaking all reasonable efforts to safeguard users' rights.

P.F.B. S.r.l. has not currently appointed a Data Protection Officer (DPO).

By consenting to subscribe to our newsletter, your contact details — and in particular your e-mail address — will be included in our mailing list for the purpose of sending commercial communications.

By subscribing to our newsletter, you express your interest and consent to receiving commercial communications from P.F.B. S.r.l. regarding promotions, initiatives, and updates related to the Controller's business activities.

The processing of your contact data for this purpose is based on your consent and may be withdrawn at any time by following the unsubscribe instructions included in each message or by contacting the Controller directly, preferably at privacy@pfb.it.

P.F.B. S.r.l. may rely on third parties that provide adequate guarantees for data protection and that are appointed as Data Processors, Data Handlers, or otherwise authorized to process personal data.

Your personal data will not be disclosed.

In particular, please note that our newsletter is managed using the service provided by **Brevo (formerly Sendinblue)**, registered with the Paris Trade and Companies Register under No. 498 019 298.

Its privacy policy can be consulted at: <https://www.brevo.com/legal/privacypolicy/>.

This provider uses sub-processors located in countries outside the EU, including the United States, meaning that data may be transferred outside the European Union to third parties subject to Standard Contractual Clauses.

Brevo undertakes to provide an adequate level of data protection through contractual safeguards, additional measures, and, for transfers to the United States, by adhering to the **EU-U.S. Data Privacy Framework**, for which the European Commission has issued an adequacy decision.

You may exercise your rights regarding your personal data at any time — including the right to access, rectify, erase, restrict processing, object to processing, or request data portability.

The full text of the rights (Articles 15–22 and 34 of EU Regulation 679/2016) is available on the Italian Data Protection Authority's website: www.garanteprivacy.it.

To exercise these rights, please contact us at the addresses above, preferably at privacy@pfb.it, dedicated to handling privacy-related requests.

If you are not satisfied, you have the right to file a complaint with the Italian Data Protection Authority.

If you would like more detailed information on the processing of your data, please refer to the extended information notice below.

P.F.B. S.r.l.

Last update: September 2025

Extended information notice

Pursuant to and for the purposes of Article 13 of EU Regulation 679/2016 (hereinafter referred to as the "GDPR") and the Italian Personal Data Protection Code (Legislative Decree 196/2003), insofar as it remains compatible, P.F.B. S.r.l., in its capacity as Data Controller, provides you with the following information regarding the processing of your contact data for the purpose of subscribing to the P.F.B. S.r.l. newsletter.

A) IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The Data Controller is **P.F.B. S.r.l.**

Via Raimondo dalla Costa no. 690, Modena (MO) – Tax Code 00158620369 – REA No. MO-118019

PEC: pfbmodena@legalmail.it – E-mail: privacy@pfb.it

B) PURPOSE, LEGAL BASIS, AND METHODS OF DATA PROCESSING

The processing of personal data provided by you and/or requested from you is carried out solely for the purpose of sending communications concerning general information, news, events, opportunities, and initiatives related to the Controller's marketing activities, distributed through the newsletter issued by the Controller, which you may subscribe to via the website www.pfb.it or by contacting the Controller directly. The processing is based on your consent pursuant to Article 6(1)(a) of EU Regulation 679/2016. It will be carried out through operations or a set of operations — possibly with the aid of automated systems — including, as defined in Article 4(1)(2) of the GDPR: "collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction," all within the limits and for the purposes described above. Please note that "personal data" (as defined in Article 4(1)(1) of the GDPR as "any information relating to an identified or identifiable natural person") provided and/or requested and/or otherwise obtained will be processed in paper form and/or through electronic, IT, and/or telematic means, using logics and methods strictly necessary for the purposes of processing. No profiling activities will be carried out. Adequate technical and organizational measures have been implemented by the Data Controller to prevent the destruction, alteration, unlawful or improper use, unauthorized disclosure, or accidental or unlawful access to personal data transmitted, stored, or otherwise processed. Your personal data will be stored and processed by the Data Controller in full compliance with the principles of fairness, lawfulness, transparency, and confidentiality, using methods strictly related to the purposes indicated in this notice. In particular, please note that processing will be carried out in accordance with the security requirements established by the GDPR (Articles 25 and 32–35), for which the Controller has conducted a risk analysis and implemented measures deemed appropriate to the identified risks.

C) NATURE OF DATA PROVISION

The provision of your personal data is strictly necessary to properly and fully manage your request to subscribe to the newsletter submitted via the website www.pfb.it.



Any refusal to provide such data and/or the provision of inaccurate and/or incomplete information will make it impossible for the Controller to correctly and fully process your request.

D) DURATION OF PROCESSING

The data provided for the purpose of subscribing to the newsletter will be processed until you express your intention to unsubscribe from the service.

Unsubscription from the newsletter may be requested at any time by following the instructions included at the bottom of each communication you receive, or by freely contacting the Controller using the contact details provided — preferably via the dedicated e-mail address privacy@pfb.it.

E) THE ENTITIES OR CATEGORIES OF ENTITIES TO WHOM PERSONAL DATA MAY BE DISCLOSED OR WHO MAY BECOME AWARE OF SUCH DATA AS DATA PROCESSORS OR AUTHORIZED PERSONS, AND THE SCOPE OF DISCLOSURE OF SUCH DATA

Your personal data will be processed exclusively by individuals specifically appointed by the Data Controller as Data Processors and/or authorized personnel. These individuals will process your data only when necessary for the purposes for which they were provided and solely within the scope of the tasks assigned to them by the Data Controller.

Pursuant to Article 28 of EU Regulation 679/2016, the Data Controller may engage third parties to process data on its behalf, formally appointing them as Data Processors. A complete and up-to-date list of the appointed Data Processors can be obtained upon request by contacting the Data Controller at the addresses indicated above and/or at the e-mail address privacy@pfb.it.

In accordance with Article 29 of EU Regulation 679/2016, the Data Controller may also rely on individuals acting under its authority and/or that of the appointed Processor; such individuals will be duly instructed.

In particular, please note that our newsletter is managed through the service provided by Brevo (formerly Sendinblue), registered with the Paris Trade and Companies Register under number 498 019 298. Its privacy policy is available at the following link: <https://www.brevo.com/legal/privacypolicy/>.

This company may use sub-processors located in countries outside the European Union, including the United States, which may result in the transfer of data outside the EU.

Brevo undertakes to provide an adequate level of data protection by implementing Standard Contractual Clauses, additional safeguards, and, for transfers to the United States, by adhering to the EU–U.S. Data Privacy Framework, which the European Commission has recognized as providing an adequate level of protection.

If, despite these safeguards, you do not wish to accept such data transfers, we invite you to refrain from subscribing to the newsletter.

For further information, including details on Brevo's sub-processors, please refer to the Data Processing Agreement available in Annex 1 of Brevo's Terms of Use, which can be consulted at: <https://www.brevo.com/legal/termsofuse/>.

F) RIGHTS UNDER EU REGULATION 679/2016 (GDPR)

The Data Controller also informs you that, as a data subject, pursuant to EU Regulation 679/2016, you may exercise the following rights concerning your personal data:

- **Access** (Art. 15 GDPR): you have the right to obtain confirmation from the Data Controller as to whether or not personal data concerning you are being processed and, where that is the case, to access information relating to such processing (purposes, categories of data, recipients or categories of recipients to whom the data are communicated, retention period, the possibility of exercising other rights regarding the data in question, the origin of the data, and the existence of automated decision-making), as well as to obtain a copy of the processed data.

- **Rectification** (Art. 16 GDPR): you have the right to obtain from the Data Controller the rectification of inaccurate personal data concerning you without undue delay. In relation to the purposes of the processing, you also have the right to have incomplete data completed, including by providing a supplementary statement.

- **Erasure** (Art. 17 GDPR): you have the right to obtain from the Data Controller the erasure of personal data concerning you without undue delay, unless there are legal grounds preventing the fulfillment of such a request (for example, compliance with a legal obligation, or the establishment, exercise, or defense of legal claims).

- **Restriction of processing** (Art. 18 GDPR): you have the right to obtain restriction of processing from the Data Controller in specific circumstances (e.g., when you contest the accuracy of the data, when processing is unlawful and you oppose erasure, requesting restriction instead, when you need the data for the establishment, exercise, or defense of legal claims, or when you have objected to processing pending verification of whether the Controller's legitimate grounds override yours).

- **Portability** (Art. 20 GDPR): you have the right to receive the personal data concerning you in a structured, commonly used, and machine-readable format and to transmit those data to another controller. The exercise of the right to portability must not, in any case, adversely affect the rights and freedoms of others.

- **Withdrawal of consent** (Art. 7 GDPR): you have the right to withdraw your consent to data processing at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal. You may, at any time, re-subscribe to the newsletter by providing new consent.

Right to object: the processing that takes place following subscription to the newsletter — whether through the online form on www.pfb.it or through a specific request made directly to the Data Controller — is based on your consent (see above).

We remind you that, if you are subscribed to the newsletter as a P.F.B. S.r.l. client, as stated in the privacy notice previously provided to you as a client (and always available in its most up-to-date version on www.pfb.it), you may also exercise the right to object under Article 21 of EU Regulation 679/2016.

G) REQUESTS AND COMPLAINTS:

The protection of your privacy and your personal data is our priority. We are fully committed to handling any complaints or reports regarding the processing of your data with the utmost seriousness and diligence, making every effort to provide satisfactory responses. We also remain available to provide any clarifications you may require regarding data processing or to address your concerns.

However, if you so wish — or if you are not satisfied with our response — you may, at any time, lodge a complaint, duly signed with an authenticated, digital, or handwritten signature (in the latter case accompanied by a copy of a valid identification document), also through



a proxy if applicable, with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) using one of the following communication channels:

- Registered mail (A/R) addressed to: "Garante per la protezione dei dati personali, Piazza Venezia 11, 00187 Rome";
- Certified email (PEC) to: protocollo@pec.gdp.it (this address accepts communications only from certified email accounts);
- In person, by delivering the complaint directly to the offices of the Italian Data Protection Authority, Piazza Venezia 11, Rome.

For further and up-to-date information on how to submit complaints, we recommend consulting the dedicated page on the Authority's website: www.garanteprivacy.it, where you can also find the most recent documentation and instructions provided by the Authority.

Modena
P.F.B. S.r.l.
The Management

Last update: September 2025