

 **Sede Legale**  
Viale B. Brin 218  
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Cap.Soc. € 40.010.000  
interamente versato  
Società soggetta a direzione e  
coordinamento di **Finarvedi S.p.A.**  
Società con Socio Unico

 **Unità Produttiva**  
Strada Sabbione, 91/A  
05100 Terni  
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Part.IVA IT 01695040558  
Cod.fisc. 01695040558  
Iscr. Reg. Impr. Umbria 01695040558

 tubificioditerni@pec.acciaiterni.info

[www.acciaiterni.it](http://www.acciaiterni.it)

 [www.arvedi.it](http://www.arvedi.it)

## INFORMATION PURSUANT TO ARTICLE 13 OF THE EUROPEAN REGULATION ON THE PROCESSING OF PERSONAL DATA N. 2016/679

This information is provided to Customers and Suppliers of Tubificio di Terni Srl. The processing of your personal data will be based on the principles of lawfulness, fairness, transparency, purpose and retention limitation, data minimization, accuracy, integrity, and confidentiality, as established by Article 5 of the GDPR ( *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016* ). Please be advised that:

**A) Data Controller** The Data Controller is **Tubificio di Terni Srl** , with registered office at Viale Benedetto Brin n. 218, 05100 – Terni, Fiscal Code 01695040558 (hereinafter "**Controller** "). For any questions regarding the processing of your personal data, you can contact the Controller at the following email address: [privacy@acciaiterni.it](mailto:privacy@acciaiterni.it).

**B) Data Protection Officer (DPO)** The Data Controller has not designated a Data Protection Officer (DPO), as the mandatory requirements set forth in Article 37 of the GDPR do not apply.

**C) Categories of Personal Data Subject to Processing** The Data Controller processes the following categories of personal data provided by you:

- **Identification and contact information:** name, surname, company name, tax code, VAT number, residential or registered office address, email address, telephone number. In the case of legal entities, this information may refer to legal representatives, contact persons, or contact persons.
- **Financial data:** bank details (e.g., IBAN), payment information, creditworthiness information.

**D) Purpose and Legal Basis of Processing** Your personal data are processed for the following purposes, associated with the respective legal bases:

1. **Management of pre-contractual and contractual relationships:** for the negotiation, stipulation, and execution of contracts for the supply of goods or services.
  - Legal basis: **Performance of a contract** to which you are a party or implementation of pre-contractual measures taken at your request (Article 6, paragraph 1, letter b) GDPR).
2. **Administrative and accounting requirements:** for accounting management, invoicing (active and passive), and management of collections and payments.
  - Legal basis: **Performance of a contract** (Article 6, paragraph 1, letter b) GDPR) and **fulfillment of a legal obligation** (Article 6, paragraph 1, letter c) GDPR), with reference to tax and accounting regulations.
3. **Compliance with legal obligations:** to comply with obligations under national or European Union legislation (e.g., tax legislation, anti-money laundering).
  - Legal basis: **Fulfillment of a legal obligation** to which the Data Controller is subject (Article 6, paragraph 1, letter c) GDPR).
4. **Litigation management and debt collection:** for the exercise and defense of the Data Controller's rights in and out of court.

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- Legal basis: **Legitimate interest** of the Data Controller (Article 6, paragraph 1, letter f) GDPR) to protect its rights.

**E) Mandatory or Optional Nature of Data Provision** The provision of personal data for the purposes described above is a **necessary requirement for the conclusion and execution of the contract**. Failure to provide such data will make it impossible for the Data Controller to establish and manage the contractual relationship with you.

**F) Processing Methods** Data is processed using manual, paper-based, computerized, and electronic means, using methods strictly related to the indicated purposes and, in any case, in a manner that guarantees the security and confidentiality of the data. The Data Controller adopts appropriate technical and organizational security measures to prevent the loss, illicit or incorrect use of data, and unauthorized access.

**G) Categories of Data Recipients** Your personal data may be disclosed to: *i)* internal personnel of the Data Controller, duly trained and authorized to process data pursuant to Art. 29 of the GDPR; *ii)* external data processors, appointed pursuant to Art. 28 of the GDPR, who provide services instrumental to the purposes indicated; *iii)* independent data controllers, such as credit institutions and insurance companies, judicial authorities, police forces, or other public administrations, where required by law, auditing and supervisory bodies. A detailed and updated list of data processors is available upon request at the Data Controller's headquarters.

**H) Transfer of Data Outside the European Economic Area (EEA)** Your personal data is processed within the territory of the European Union.

**I) Data Retention Period** Personal data will be retained for a period of time no longer than is necessary to achieve the purposes for which they are processed, in compliance with the data minimization principle. In particular:

- For contractual, administrative, and accounting purposes, the data will be retained for the entire duration of the contractual relationship and, after its termination, for a period of 10 years, in compliance with the retention obligations set forth by civil and tax legislation (Article 2220 of the Italian Civil Code).
- For litigation management purposes, the data will be retained for the time necessary to ensure the protection of the Data Controller's rights, until the dispute is definitively resolved.

**L) Existence of an Automated Decision-Making Process** The Data Controller does not use automated decision-making processes, including profiling, pursuant to Article 22, paragraphs 1 and 4, of the GDPR, which produce legal effects concerning you or similarly significantly affect you.

**M) Rights of the Data Subject** As a data subject, you may exercise at any time the rights provided for in Articles 15 to 22 of the GDPR, and in particular:

- Right of access (Article 15): obtain confirmation as to whether or not data concerning you is being processed, and, where that is the case, access to the data and information relating to the processing.
- Right to rectification (Article 16): obtain the correction of inaccurate personal data or the integration of incomplete data.
- Right to erasure ("right to be forgotten", art. 17): obtain the erasure of your data in the cases provided for by the GDPR (e.g., the data is no longer necessary for the purposes for which it was collected).

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- Right to restriction of processing (Article 18): obtain restriction of processing in certain circumstances (e.g., if the accuracy of the data is contested).
- Right to data portability (Article 20): receive your personal data in a structured, commonly used, and machine-readable format and transmit that data to another controller, where applicable.
- Right to object (Article 21): to object to the processing of personal data if this is based on the legitimate interest of the Data Controller.

To exercise your rights, you can send a written communication by registered mail with return receipt to Viale Benedetto Brin n. 218, 05100 – Terni, CF 01695040558, or by email to: [privacy@acciaiterni.it](mailto:privacy@acciaiterni.it).

- Right to lodge a complaint (Article 77): Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the competent supervisory authority, which in Italy is the Italian Data Protection Authority (Piazza Venezia n. 11, 00187 - Rome; [www.gpdp.it](http://www.gpdp.it)).

Terni, May 19, 2026

**The Data Controller**