

Information on the protection of personal data

1. Name and address of the data controller

The data controller pursuant to the General Data Protection Regulation 679/2016 ("GDPR"), other data protection laws in force in the Member States of the European Union and other provisions on data protection is the company General-OXO s.a. with registered office in via Gaggiolo 55, 6855 Stabio, Switzerland.

2. Name and address of the data protection officer

The contact details of the data protection officer (DPO) are: accounting@general-oxo.ch . Anyone interested can contact us directly with any questions or suggestions on data protection.

3. Definitions

Our data protection information is based on the definitions of the General Data Protection Regulation (hereinafter, also only GDPR). Our data protection policy is intended to be easy to read and understand. In order to guarantee this characteristic, we provide below an explanation of the terms used.

● Personal data

Personal data means any information relating to an identified or identifiable natural person (hereinafter "interested"). The natural person who can be identified, directly or indirectly, with particular reference to an identifier such as the name, an identification number, location data, an online identifier or one or more characteristic elements of his physical identity is considered identifiable, physiological, genetic, psychic, economic, cultural or social.

● Interested part

The interested part is any identified or identifiable natural person, whose personal data are processed by the owner.

● Data treatment

Data treatment is any operation or set of operations, carried out with or without the aid of automated processes and applied to personal data, such as the collection, registration, organization, structuring, storage, adaptation or modification, the extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, cancellation or destruction.

- **Limitation of treatment**

The limitation of treatment is the marking of stored personal data aimed at limiting their processing in the future.

- **Profiling**

Profiling is any form of automated processing of personal data consisting in the use of such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning professional performance, economic situation, health, personal preferences, interests, reliability, behavior, location or movements of said natural person.

- **Pseudonymisation**

Pseudonymisation is the processing of personal data in such a way that personal data can no longer be attributed to a specific interested party without the use of additional information, provided that such additional information is stored separately and subject to technical and organizational measures aimed at ensure that such personal data is not attributed to an identified or identifiable natural person.

- **Data controller**

Data controller is the natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of the processing of personal data. When the purposes and means of such processing are determined by Union or Member State law, data controller or the specific criteria applicable to its designation may be established by Union or Member State law.

- **Data processor**

The data processor is the natural or legal person, public authority, service or other body that processes personal data on behalf of the data controller.

- **Recipient**

Recipient is the natural or legal person, public authority, service or other body that receives communication of personal data, whether or not it is a third party. However, public authorities which may receive disclosure of personal data in the context of a specific investigation in accordance with Union or Member State law are not considered to be recipients.

- **Third party**

Third party is the natural or legal person, public authority, service or other body other than the interested party, the data controller, the data processor and the persons authorized to process personal data under the direct authority of the owner or the manager.

Consent

Consent of the interested party is any manifestation of free, specific, informed and unequivocal will of the interested party, with which the same expresses its consent, through an unequivocal declaration or positive action, that the personal data concerning him are subject to treatment.

4. General information on data processing

Data protection, data security and confidentiality have top priority for us. In principle, you can visit our website without providing any personal information. Your personal data will be processed in accordance with the requirements of the GDPR and in accordance with the specific national data protection provisions applicable to us, in Italy in particular the Legislative Decree June 30, 2003, n. 196, as modified and integrated with Legislative Decree 10 August 2018, n. 101. With this data protection information, we wish to inform you of the type, extent and purpose of the personal data we process. Furthermore, with this data protection information, we wish to inform you about your rights.

We have adopted technical and organizational measures to ensure adequate protection of personal data processed through our website. This website uses SSL encryption for security reasons and to protect the transmission of confidential content, such as requests via contact form that you send to us as the site operator. An encrypted connection is recognized by the fact that the browser's address line changes from "http: //" to "https: //" and by the lock symbol in the browser's line. If SSL encryption is activated, the data you transmit to us cannot be read by third parties. However, given that data

transmissions via the Internet can, in principle, present security gaps, absolute protection cannot be guaranteed.

5. General information on legal bases

If the data subject's consent is collected for the processing of personal data, art. 6 par. 1 letter a) of the GDPR constitutes the legal basis for the processing of personal data. If the treatment is based on consent, the interested party has the right to withdraw the consent at any time without prejudice to the lawfulness of the treatment based on the consent given before the revocation.

Article n. 6 par. 1 letter b) GDPR serves as a legal basis for the processing of personal data necessary for the execution of a contract of which the interested party is a contracting party. This also applies to the treatments necessary for the execution of pre-contractual measures.

If the processing of personal data is necessary for the fulfillment of a legal obligation to which our company is subject, the legal basis is constituted by art. 6 par. 1 letter c) GDPR.

Where the vital interests of the data subject or of another natural person make it necessary to process personal data, the legal basis is constituted by art. 6 par. 1 letter d) GDPR.

If the processing is necessary for the pursuit of a legitimate interest of our company or of third parties and the interests, fundamental rights and freedoms of the interested party do not prevail over the interests of the former, the legal basis of the processing is constituted by art. 6 par. 1 letter f) GDPR.

6. General information on the deletion of data and on the retention period

The personal data of the interested party are deleted or made inaccessible, as soon as the purpose of the conservation ceases. Furthermore, retention can take place for a longer period if this is provided for by Union regulations, laws or other rules to which the owner is subject, issued by the European or national legislator. The data will also be made inaccessible or deleted even after the expiry of a retention period prescribed by the aforementioned rules,

except in the case where it is necessary to keep the data for a further period for the purposes of stipulating or executing a contract.

7. Collection of general data and information

Our website collects a series of general data and information every time an interested party or an automated system accesses the website. This general data and information is stored in the server log files. The (1) types and versions of browsers used can be collected, (2) the operating system used by the access system, (3) the website from which an access system accesses our website (the so-called referrer), (4) the sub-sites displayed on our website via an access system, (5) the date and time of access to the website, (6) an Internet protocol address (IP address), (7) the provider of access system Internet services and (8) other similar security-related data and information in the event of attacks on our IT systems.

When we use these general data and information, we do not trace them back to the data subject in any way. This information is necessary rather (1) to correctly display the contents of our website, (2) to optimize the contents of our website and its advertising, (3) to ensure the long-term functionality of our IT systems and technology on our website and (4) to provide law enforcement authorities with information needed in the event of a cyber attack. This data and information collected anonymously are evaluated by us both statistically and in order to increase the protection and security of data within our company, in order to guarantee an optimal level of protection of the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by the interested party.

Legal basis	Conservation purposes	Retention period	Possibility of cancellation and opposition
Art. 6 par. 1 letter f) GDPR (legitimate interest)	Temporary retention of the IP address by the system is necessary to allow the display of the website on the user's	The data will be deleted as soon as it is no longer necessary to achieve the purpose for which it was collected. In the	No, as it is essential for the website to function.

	<p>computer. To this end, the user's IP address must remain stored for the duration of the session.</p>	<p>event that the data is collected to make the website available, this occurs at the end of the respective session.</p> <p>If the data is stored in log files, this occurs after seven days at the latest. It is not possible to keep them for a longer period. In this case, the IP addresses of the users are deleted or modified, so that it is no longer possible to trace the access client.</p>	
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8 . Contact form and email contact

There are contact forms on our website that can be used to make contact electronically. If a user takes advantage of this opportunity, the data entered in the appropriate form is transmitted to us and stored. As a rule, the data are as follows:

- First name
- Last name
- E-mail
- Website
- Message

When sending the message, the following data is also stored:

- Date and time of sending

Alternatively, you can contact us through the published email address. In this case, the personal data transmitted by you via email will be kept.

In this context, the data will not be disclosed to third parties. The data will be used exclusively for the purpose of managing the conversation.

Legal basis	Conservation purposes	Retention period	Possibility of cancellation and opposition
<p>The legal basis for the processing of data in case of requests for information through the contact form and / or email is normally art. 6 par. 1 letter b) GDPR. (contract execution; pre-contractual measures)</p> <p>Art. 6 par. 1 letter c) GDPR (fulfillment of a legal obligation, e.g. answer to questions on data protection), furthermore Art. 6 par. 1 letter f) GDPR</p>	<p>The processing of personal data by insertion / email mask is used exclusively for the management of contact. In this aspect also lies the necessary and legitimate interest in the processing of data.</p> <p>The other personal data processed during the sending process are used to prevent misuse of the contact form and to guarantee the</p>	<p>The data will be deleted as soon as it is no longer necessary to achieve the purpose for which it was collected. For the personal data of the contact form insertion and those sent by email, this occurs when the respective conversation with the user ends. The conversation is concluded when circumstances allow to deduce that the case in question has been definitively clarified.</p> <p>The foregoing does not apply to correspondence subject to retention obligations under commercial law.</p> <p>The additional personal data collected</p>	<p>The user has the opportunity to object to the storage of their personal data at any time. In this case, the conversation cannot continue.</p>

(legitimate interest).	security of our IT systems. Treatment is required to improve contact quality	during the sending process will be deleted within a period of seven days.	
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9 . Protection of personal data in the selection of personnel

We collect and process the personal data of the candidates for the purpose of managing the selection procedure. The treatment can also be carried out electronically. This is especially true in cases where the candidate sends us the relevant documentation electronically, for example via e - mail. In the event of an employment contract, the data you have sent us will be kept for the purpose of managing the employment relationship, in accordance with the provisions of the law. If the data controller does not conclude any employment contract with the candidate, his documentation will be automatically deleted six months after notification of the decision not to select him, except in cases where the cancellation conflicts with other legitimate interests of the data controller. treatment.

Legal basis	Conservation purposes	Retention period	Possibility of cancellation and opposition
The legal basis for the processing of data in case of requests for information through the contact form and / or email is normally art. 6 par. 1 letter b) GDPR. (execution of employment contract;	In the event of an employment contract, the data you have sent us will be kept for the purpose of managing the employment relationship in accordance with	If the data controller does not conclude any employment contract with the candidate, his documentation will be automatically deleted six	Possibility of opposition and cancellation only general.

<p>pre-contractual measures);</p> <p>Art. 6 par. 1 letter c) GDPR (fulfillment of a legal obligation, e.g. answer to questions on data protection),</p> <p>furthermore Art. 6 par. 1 letter f) GDPR (legitimate interest) as well</p> <p>Art. 9, par. 1, lett. b, GDPR (fulfillment of obligations and rights of the data controller regarding labor law and social security</p>	<p>the provisions of the law.</p>	<p>months after notification of the decision not to select him, except in cases where the cancellation conflicts with other legitimate interests of the data controller. treatment.</p> <p>Other legitimate interests in this regard include, for example, the evidentiary obligation in any judgments related to the selection of personnel.</p>	
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10 . Cookie - Description and extent of data processing

Like many websites, we use cookies for our online service, in compliance with the relevant European legislation (directive 2009/136 / EC, amended directive 2002/58 / EC "E-Privacy") and national (provision for the protection of personal data of 8 May 2014 and subsequent clarifications).

Cookies are small text files which are stored on your computer and which store certain data and settings via browser for exchange with our online service. A cookie normally contains the name of the domain from which the cookie file was sent, as well as information on the age of the cookie and an alphanumeric identifier.

Cookies allow us to recognize your computer and make any default settings immediately available. Cookies help us improve our online service and offer you a better and more personalized service.

The cookies we use are so-called session cookies, which are automatically deleted when the browser is closed.

We also use cookies on our website that allow an analysis of users' browsing behavior.

User data collected in this way are pseudonymised with specific techniques. It follows that it is no longer possible to associate data with the user who visited the site. The data is not stored together with other personal data of the user.

When you visit our website, a special banner informs you of the use of cookies for analysis purposes and refers you to this information on data protection. You can set your browser to be informed about the use of cookies and decide on a case-by-case basis whether to accept them or to exclude the use of cookies in some cases or in general. Refusing the use of cookies can limit the functionality of our website. The following links contain information on how to activate or deactivate cookies in the main browsers:

Mozilla

Firefox: <https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie> Chrome: <https://support.google.com/accounts/answer/61416?hl=it> Internet Explorer: <https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>

Being aware that the continuation of navigation through access to another area of the site or selecting an item of the same (for example, an ' image or a link) involves the provision of consent to the use of cookies, You agree to the our cookies if you activate or not deactivate the use of cookies and continue to use the website.

Legal basis	Conservation purposes	Retention period	Possibility of cancellation and opposition
Art. 6 par. 1 letter f) GDPR (legitimate	The purpose of using the	Cookies are stored on the	You can deactivate or limit the transmission

<p>interest) for cookies not strictly necessary from a technical point of view</p> <p>Art. 6, par. 1, let. b) for cookies strictly necessary from a technical point of view</p> <p>Furthermore Art. 6 par. 1 letter a) GDPR (consent)</p>	<p>necessary cookies from a technical point of view is to simplify the use of websites for users. Some functions of our website cannot be offered without the use of cookies. For these functions, the browser must be recognized even after a page change.</p> <p>Analysis cookies are used for the purpose of improving the quality of our website and its contents. Through analysis cookies, we understand how the website is used and therefore we can constantly optimize our service.</p> <p>Our legitimate interest in the processing of personal data</p>	<p>user's computer and transmitted to our site by the user. Therefore, the user also has full control over the use of cookies.</p>	<p>of cookies by changing the settings of your Internet browser. Already saved cookies can be deleted at any time and can also be deleted automatically. Disabling cookies for our website can limit the website's functions.</p> <p>The transmission of Flash cookies cannot be prevented with the browser settings, but by changing the Flash Player settings.</p>
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	pursuant to art. 6 par. 1 letter f) GDPR.		
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In addition, visiting our site also involves the use of the following third-party cookies

11 . Social Media channels, plug-ins and monitoring tools

Below are the plugins that General-OXO uses or could use. Plugins are non-standalone programs that interact with other programs to extend their functions.

- **Data protection information for the use and use of Google Analytics (with anonymization function)**

On our website we have integrated the Google Analytics component (with anonymization function). Google Analytics is a Web Analytics service. Web analysis consists in the collection and interpretation of data on the behavior of visitors to websites. A web analysis service also collects data on the website of origin of the interested party (the so-called referrer), which sub-pages of the website he has visited, as well as how often and for how long. A web analysis is essentially used for the optimization of a website and for the cost-benefit analysis of Internet advertising.

The company that manages the Google Analytics component is Google Inc, 1600 Amphitheater Pkwy, Mountain View, CA 94043-1351, USA.

The data controller uses the suffix "_gat._anonymizeIp" for web analysis through Google Analytics. This suffix is used by Google to abbreviate and anonymize the IP address of the data subject's Internet connection if the website is accessible from a Member State of the European Union or from another member of the European Economic Area.

The purpose of the Google Analytics component is to analyze the traffic on our website. Google uses the data and information obtained, inter alia, to evaluate the use of our website, to compile online reports for us that summarize the activities on our website and to provide other services in relation to the use of our website.

Google Analytics places a cookie on the information technology system of the interested party. The function of cookies has already been explained. By placing cookies, Google is able to perform an analysis of the use of our website. Whenever you access one of the individual pages of this website, managed by the data controller and on which the Google Analytics component has been integrated, the Internet browser of the information technology system of the interested party will automatically proceed through the Google Analytics component to transmit data to Google for online analysis. As part of this technical process, Google becomes aware of personal data, such as the IP address of the data subject, which Google uses, among other things, to track the origin of visitors and clicks and, subsequently, to allow issuing invoices for commissions.

The cookie is used to store personal information, such as the time of access, the place from which access originated and the frequency of visits by our data subject to our website . Whenever you visit our website, this personal data, including the IP address of the Internet connection used by the data subject, is sent to Google in the United States of America. This personal data is stored by Google in the United States of America. Google may share the personal information collected during the technical process with third parties.

The interested party can prevent the use of cookies by our website at any time, as described above, by setting the Internet browser used in this regard, and therefore permanently oppose the use of cookies. This setting of the Internet browser used would also prevent Google from saving a cookie on the information technology system of the interested party. In addition, a cookie already saved by Google Analytics can be deleted at any time via the Internet browser or other software programs.

The interested party also has the possibility to object to the collection of data generated by Google Analytics and relating to the use of this website and to the processing of such data by Google, treatment that can prevent. To this end, the interested party must download and install a browser add-on available at the link <https://tools.google.com/dlpage/gaoptout> . This browser add-on communicates to Google Analytics via JavaScript that data and information on visits to websites cannot be transmitted to Google Analytics . The installation of the browser add-on is considered as a refusal by Google. If the information technology system of the data subject is deleted, formatted or reinstalled at a later date, the data subject must reinstall the browser add-on to deactivate Google Analytics. If the browser

add-on is uninstalled or disabled by the data subject or by another person who falls under his control, the browser add-on can be reinstalled or reactivated.

Further information and Google's data protection information are available at the following

links: <https://policies.google.com/privacy?hl=it> and <https://www.google.com/analytics/terms/it.html> .

Further explanations on Google Analytics are available at the following

link: <https://marketingplatform.google.com/about/> .

• **Data protection notice for the use and use of Google AdWords**

We have integrated Google AdWords into this website. Google AdWords is an Internet advertising service that allows advertisers to serve ads on both the Google search engine results and on the Google advertising network. Google AdWords allows an advertiser to pre-define the keywords through which an ad will appear in the results of the Google search engine only if with the search engine the user will see a search result relevant to the purposes of these keywords. In the Google advertising network, the ads are distributed to the relevant websites using an automatic algorithm that takes into account the previously defined keywords.

The company that manages the Google AdWords services is Google Inc, 1600 Amphitheater Pkwy, Mountain View, CA 94043-1351, USA.

The purpose of Google AdWords is to promote our website by displaying advertisements of interest on third party websites and in the search results of the Google search engine, and by displaying third party advertisements on our website.

If an interested party comes to our website from a Google ad, Google saves a so-called conversion cookie on the information technology system of the data subject. The function of cookies has already been explained. A conversion cookie loses its validity after thirty days and does not serve to identify the interested party. If the cookie has not yet expired, the conversion cookie is used to check whether some subpages, such as the cart of an online store, have been consulted on our website. With the conversion cookie, both we and Google can monitor whether a person who visited our website through an AdWords ad generated revenue, i.e. completed or canceled a purchase.

The data and information collected through the use of the conversion cookie are used by Google to compile statistics on visits to our website. These visit statistics are also used by us to determine the total number of users who have been referred to our site through AdWords ads, i.e. to determine the success or failure of the respective AdWords ad and to optimize our AdWords ads. for the future. Neither our company nor other Google AdWords advertisers receive information from Google that could identify the data subject.

The conversion cookie is used to store personal information, such as the websites visited by the interested party. Whenever you visit our websites, personal data, including the IP address of the Internet connection used by the data subject, is transmitted to Google in the United States of America. This personal data is stored by Google in the United States of America. Google may share this personal information collected during the technical process with third parties.

The interested party can prevent the use of cookies by our website at any time, as described above, by setting the Internet browser used in this regard, and therefore permanently oppose the use of cookies. This setting of the Internet browser used would also prevent Google from saving a conversion cookie on the information technology system of the interested party. In addition, a cookie already saved by Google AdWords can be deleted at any time via the Internet browser or other software programs.

The interested party also has the possibility to object to Google's personalized advertising. To this end, the data subject must access the link www.google.de/settings/ads from any of the Internet browsers he uses and select the desired settings.

Further information and Google's data protection information are available at the following link: <https://policies.google.com/privacy?hl=it> .

• Data protection information for the use and use of Google Tag Managers

Google Tag Manager is a solution that allows us to manage website tags through a single interface. The Tool Tag Manager (which implements the tags) is a domain without cookies and does not collect personal data. The tool generates other tags which can in turn collect data. Google Tag Manager does not access this data. If deactivation has been carried out at the domain or

cookie level, it will apply to all tracking tags implemented with Google Tag Manager. <http://www.google.it/tagmanager/use-policy.html> .

If you do not wish it, even in this case you can prevent cookies from being saved using the settings of your browser. It also has the option of selecting Google's ad types or opting out of personalized ads on Google via advertising settings (<https://adssettings.google.com/authenticated?hl=it>). Finally, it is possible to disable the use of cookies by third parties by resorting to the deactivation support of the Network Advertising Initiative (<http://optout.networkadvertising.org/?c=1###/>).

• Other social media plugins

If we use other social media plugins, you will find more information on data protection in the respective data protection information of these social networks. If you're unable to find them, please contact the contact address specified in our page .

Legal basis	Conservation purposes	Retention period	Possibility of cancellation and opposition
Art. 6 par. 1 letter f) GDPR (legitimate interest)	The purpose and legitimate interest in setting third-party cookies is to improve our services for you by analyzing your behavior as a user. As a rule, the transfer of data to third parties takes place only in pseudonymised form. Furthermore, it is up to you to prevent the transmission of third-party cookies by setting your Internet browser	Third-party cookies are saved on the user's computer and transmitted to our site by the user. Therefore, the user also has full control over the use of third-party cookies.	You can disable or limit the transmission of third-party cookies by changing the settings of your Internet browser. Third-party cookies already saved can be deleted at any time and can also be deleted automatically. The transmission of Flash cookies cannot be prevented with the

	accordingly. Compare the above information on individual third party suppliers in detail.		browser settings, but by changing the Flash Player settings.
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12 . Your rights

If the processing concerns your personal data, you are the interested party pursuant to the GDPR and have the following rights towards the owner:

● Right to information

You can ask the data controller for confirmation that personal data processing is being processed or not.

If such treatment exists, you can obtain access to personal data and the following information:

1. the purposes of the processing of personal data;
2. the categories of personal data processed;
3. the recipients or categories of recipients to whom the personal data have been or will be communicated;
4. the retention period of personal data provided or, if not possible, the criteria used to determine this period;
5. the existence of the right of the interested party to ask the data controller to correct or delete personal data or to limit the processing of personal data concerning him or to oppose their treatment;
6. the existence of the right to lodge a complaint with a supervisory authority;
7. all available information on the origin of the data, if personal data are not collected from the interested party;
8. the existence of an automated decision-making process, including the profiling pursuant to art. 22, par. 1 and 4 GDPR, and, at least in such cases, significant information on the logic used, as well as the importance and expected consequences of such treatment for the data subject.

You have the right to request information on the transfer of personal data concerning you to a third country or to an international organization. In this context, it may request information on the existence of adequate guarantees pursuant to art. 46 GDPR in relation to the transfer.

- **Right to rectification**

You have the right to obtain from the data controller the correction and / or integration of your inaccurate or incomplete personal data. The owner must make the correction without undue delay.

- **Right to limit treatment**

You can request that the processing of your personal data be limited when one of the following hypotheses occurs:

1. if you dispute the accuracy of the personal data concerning you for a period of time that allows the holder to verify the accuracy of the personal data;
2. the treatment is illegal and you refuse to delete the personal data and instead request the limitation of the use of the personal data;
3. the data controller no longer needs personal data for the purposes of the processing, but you need it for the assessment, exercise or defense of a right in court; or
4. if you have opposed the treatment pursuant to art. 21 par. 1 GDPR and it has not yet been established whether the legitimate reasons of the owner prevail over yours.

If the processing of your personal data has been limited, such data cannot be processed, except for their conservation, without your consent, or to ascertain, exercise or defend a right in court, to protect the rights of another natural or legal person or for important reasons of public interest of the Union or of a Member State.

If the limitation of the processing was carried out on the basis of the above hypotheses, the owner will inform you before the limitation is lifted.

- **Right to cancel**

- **Obligation to cancel**

You have the right to obtain from the data controller the cancellation of personal data concerning you without undue delay and the data controller has the obligation to delete such data without undue delay, if one of the following reasons exists:

1. The personal data concerning you are no longer necessary for the purposes for which they were collected or otherwise processed.
2. You withdraw your consent to the treatment pursuant to art. 6 par. 1 letter a) or art. 9 par. 2 lett. a) GDPR and there are no other legal bases for the processing.

3. You object to the treatment pursuant to art. 21 par. 1 GDPR and there are no imperative and legitimate reasons for the treatment or opposes the treatment pursuant to art. 21 par. 2 GDPR.
4. The personal data concerning you have been unlawfully processed.
5. The deletion of your personal data is necessary to fulfill a legal obligation under Union law or the law of the Member States to which the data controller is subject.
6. The personal data concerning you have been collected in relation to the services offered by the information society pursuant to art. 8 par. 1 GDPR.

● **Information to third parties**

If the owner has made public the personal data concerning you and has the obligation to delete them pursuant to art. 17 para. 1 GDPR, will take appropriate measures, including technical ones, taking into account the available technology and implementation costs, to inform those responsible for the processing of personal data that you, as an interested party, have requested the deletion of all links to this personal data or copies or replicas of such personal data.

● **Exceptions**

The right of cancellation does not exist if the treatment is necessary

1. for the exercise of freedom of expression and information;
2. to fulfill a legal obligation that the processing requires under Union or Member State law to which the data controller is subject or to perform a public interest task or in the exercise of public powers with which the data controller is invested ;
3. for reasons of public interest in the public health sector pursuant to art. 9 par. 2 lett. h) and i) and art. 9 par. 3 GDPR;
4. for archiving purposes in the public interest, for scientific or historical research or for statistical purposes in accordance with art. 89, par. 1 GDPR to the extent that the right referred to in point a) risks making it impossible or seriously compromising the achievement of the objectives of this treatment, or
5. for the assessment, exercise or defense of a right in court.

Furthermore, the right of cancellation does not exist if personal data must be kept by the owner due to legal obligations and retention periods. In this case, personal data will be made inaccessible instead of being deleted.

● **Right to information**

If you have exercised your right to rectify, cancel or limit the processing of your personal data towards the data controller, the latter is required to inform all recipients to whom the personal data concerning you have been communicated regarding the rectification, cancellation of data or limitation of processing, unless this proves impossible or involves a disproportionate effort.

You have the right towards the owner to be informed about these recipients.

● **Right to data portability**

You have the right to receive in a structured format, commonly used and readable by an automatic and interoperable device, the personal data concerning you provided to the data controller. Furthermore, you have the right to transmit such data to another data controller without hindrance by the data controller to whom you have provided them if:

1. the treatment is based on consent pursuant to art. 6, par. 1, lett. a) GDPR, or art. 9, par. 2, lett. a) GDPR, or on a contract pursuant to art. 6, par. 1, lett. b) GDPR e
2. the treatment is carried out by automated means.

Furthermore, in exercising this right, you have the right to obtain the direct transmission of your personal data from one data controller to another, if technically feasible. This right must not harm the rights and freedoms of others.

The exercise of the right to portability does not apply to the treatment necessary for the execution of a task in the public interest or connected to the exercise of public powers with which the data controller is invested.

● **Right to object**

You have the right to object at any time, for reasons related to your particular situation, to the processing of your personal data pursuant to art. 6, par. 1, lett. e) of) GDPR, including profiling based on these provisions.

The data controller refrains from further processing personal data unless he demonstrates the existence of compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the interested party or for the assessment, exercise or the defense of a right in court.

If your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you carried out for these purposes, including profiling to the extent that it is connected to this direct marketing.

If you object to the processing for direct marketing purposes, your personal data are no longer processed for these purposes.

In the context of the use of information society services and without prejudice to Directive 2002/58 / EC, you can exercise your right of opposition with automated means that use technical specifications.

● **Right to withdraw consent to data processing**

You have the right to withdraw your consent to the processing of personal data at any time without having to indicate the reason. In case of revocation, your data will be deleted without undue delay and will no longer be processed. The withdrawal of consent does not affect the lawfulness of the treatment based on consent before the revocation.

● **Automated decision making in the single case including profiling**

You have the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or which significantly affects your person in a similar way. This does not apply in the event that the decision

1. is necessary for the conclusion or execution of a contract between you and the data controller,
2. is authorized by Union or Member State law to which the data controller is subject, which also specifies adequate measures to protect your rights, freedoms and legitimate interests, or
3. is based on your explicit consent.

However, these decisions cannot be based on the particular categories of personal data referred to in art. 9, par. 1 GDPR, unless art. 9, par. 2, letters a) or g) GDPR and adequate measures are in place to protect your rights, your freedoms and your legitimate interests.

In the cases referred to in points (1) and (3), the data controller implements appropriate measures to protect your rights, freedoms and legitimate interests, at least the right to obtain human intervention by the data controller , to express their opinion and contest the decision.

- **Right to lodge a complaint with the supervisory authority**

Without prejudice to any other administrative or judicial appeal, if you believe that the processing that concerns you violates this regulation, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State in which you habitually reside, work or in the place where you the alleged violation has occurred. In Italy the supervisory authority is the Data Protection Supervisor, Piazza Venezia, 11, 00187, Rome.

The supervisory authority to which the complaint was proposed informs the complainant of the status or outcome of the complaint, including the possibility of a judicial appeal pursuant to art. 78 GDPR.

13 . Changes to this data protection statement

The date shown (below) indicates the version of the information on the protection of personal data. We reserve the right to modify this privacy policy at any time with future effect. The latest version is always available online. Please check the online service regularly and inquire about the version of the privacy policy in force.

Update: May 2020

Responsible: [General-OXO](#)

Information to commercial partners (in particular customers and suppliers), as well as access to information on data processing pursuant to art. 12, 13, 14 ss and 21 GDPR

Dear Ms.,

Dear Mr.,

Dear Business Partner,

the legal provisions of the General Data Protection Regulation (GDPR) require us to provide you with a complete picture (art.13 GDPR) of the processing of your personal data, an obligation that we are happy to

fulfill. Data protection and the processing of your personal data are very important to us, and we always pay close attention to the correct processing of your personal data. If you have any questions regarding the processing of personal data, do not hesitate to contact us or our data protection officer. Furthermore, the data protection officer who does not receive any instructions, is independent in his function and is legally bound to secrecy and confidentiality, he can contact with confidence. In relation to the processing of your personal data, we inform you of the following:

1. Name of the holder

The owner of the processing of your personal data is
General-OXO s.a.

2. Legal representative

Alexis Denna

3. Address of the holder

- Registered office:
Via Gaggiolo, 5 5
6855 Stabio
Switzerland

Tel.: + 41 916472233

Email: accounting@general-oxo.ch

4. Purpose of data processing

The processing of your personal data is aimed at establishing, executing and terminating a contractual relationship (consultancy, purchase planning, supply and service) with you as a commercial partner.

5. Categories of data

In this context, we process in particular the following data or categories of personal data concerning you:

- Society
- Surname + first name of the interlocutor
- Date of birth of the interlocutor
- Company address data, sole proprietorship or private customer
- Banking data
- Other details for the payment
- Product supply statistics
- Invoice amount
- Data regarding the content of the existing business relationship, such as business correspondence, email and notes on oral or telephone correspondence

6. Legal basis of the processing

The legal basis for the processing of your personal data consists of:

- **Contract pursuant to art. 6 par. 1 letter b) GDPR** (e.g. purchase, supply and service contracts)
- **Consent pursuant to art. 6 par. 1 letter a), 7 GDPR** (e.g. newsletter, transfer to establishments in third countries; transfer to other parties),
- **Compliance with a legal obligation and in the individual case pursuant to art. 6 par. 1 letter c) GDPR** (e.g. notifications to the Tax Office; replies to requests of a legal nature or concerning data protection)
- **Pursuit of interest pursuant to art. 6 par. 1 letter f) GDPR** (e.g. exercise of the owner's right; exercise of rights or legal defense ; guarantee of IT security of GENERAL-OXO s.a .; prevention and detection of criminal offenses; video surveillance for the purpose of collecting evidence in case of criminal offenses: this is therefore aimed at protecting customers and staff, as well as exercising the right to property; measures for the safety of buildings and plants (e.g. access controls).

7. Recipients or categories of recipients

In order to fulfill our contractual and legal obligations, the data is transmitted to the following recipients or categories of recipients:

- Person in charge and manager of the respective department / function
- Banking institutions

- Insurance companies
- External service providers
 - IT company
 - Hosting company
 - Marketing company
 - E-procurement company
- Logistics company
- Destruction of documents
- Data protection officer
- Factories abroad, where your request, supply or offer refers to them
- Controlling / Revision
- Auditing firm
- Tax office

8. Transfer to a third country

In the event that your products or other services are offered for a specific country, or if through our site you request information on products from a specific country, we will transmit your data to our company connected abroad, especially in the EU, but depending on your offer or your request also in non-European countries. Some countries, such as Russia or the United Arab Emirates, are considered third countries under the GDPR and do not have adequate legislation for the protection of personal data. It follows that for the transfer of your data to a third country, we require your explicit consent.

9. Retention period, cancellation of personal data

In order to fulfill our contractual and legal obligations, we retain the data, where there is no legitimate interest pursuant to art. 6 I lett. f) GDPR which would justify a longer retention period, for the following periods:

If necessary, we process and store your personal data for the duration of our business relationship, which includes, for example, the initiation and execution of a contract. The terms for the conservation and documentation specified in such sources are of the decade.

10. Right of access, rectification, etc.

In relation to your personal data, the rights you can exercise towards us are as follows:

- right to information
- right to rectification or cancellation
- right to limitation of processing,
- right to data transferability.
- right to lodge a complaint with a data protection supervisory authority on the processing of your personal data, if you do not agree with the management of your data and
- **Right of revocation** : you have the right to withdraw your consent to the processing of personal data at any time. The withdrawal of consent does not affect the lawfulness of the treatment based on consent before the revocation.
- **Right to object** : You have the right to object at any time, for reasons related to your particular situation, to the processing of personal data concerning you pursuant to art. 6, par. 1, lett. e) of) GDPR, including profiling based on these provisions.
 - The data controller refrains from further processing personal data unless he demonstrates the existence of compelling legitimate reasons to proceed with the processing that prevail over the interests, rights and freedoms of the interested party or for the assessment, exercise or the defense of a right in court.
 - If your personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you carried out for these purposes, including profiling to the extent that it is connected to this direct marketing.
 - If you are opposed to the processing for direct marketing purposes, your personal data is not processed for those purposes.
 - In the context of the use of information society services and without prejudice to Directive 2002/58 / EC, you can exercise your right of opposition with automated means that use technical specifications.

11. Rules for mutual treatment

If we exchange data of your or our customers for a treatment, e.g. as part of the execution of direct shipments (drop shipments), we are not in the presence of a data processing pursuant to art. 28 par. 3 GDPR, but rather a transfer of data, since you or we process the data for your or our purposes, i.e. to fulfill your or our obligation to supply and in the context of the discretionary use of your / our means. To ensure legal compliance we establish the following reciprocity-based treatment:

- Commissioner and client undertake to process personal data only in accordance with the law pursuant to the General Data Treatment Regulation (GDPR) as well as possibly other specific legal provisions.
- The commissioner and client staff, as well as the auxiliary staff, are required to maintain the confidentiality of the data pursuant to art. 29 GDPR. If the commissioner or the client make use of a data controller for the processing of personal data in the context of the execution of the order, the data controller must be carefully selected in terms of guaranteed level of data protection and must be obliged and controlled pursuant to art. 28 GDPR under a data processing contract. The same applies by analogy where the commissioner and the client make use of another third party for the execution of your order by transfer of functions. The obligations deriving from the obligation of confidentiality / data processing contract refer to all individual information on a person's personal and material situation, as well as to all protection measures for such information. In particular, the commissioner and the client are required not to process personal data without authorization.
- The commission agent will use the personal data that he receives or collects from the client and / or third parties in the execution of the order, in principle only for the purpose of executing the order. The customer agrees to this type of treatment linked to specific purposes. These personal data may be used for purposes other than joint execution of the order (change of purpose) only with the customer's separate written consent.
- In case of transmission of personal data to the commissioner, the client guarantees the commissioner to have the right to do so on the basis of an authorization pursuant to the GDPR .
- In case of breach of these obligations by the commissioner and / or client, the other party reserves the right to assert the consequent right to compensation for damages and / or recourse.
- In internal relations, the commissioner and the client are responsible only if the violation falls within the respective area of responsibility. In the presence of a violation that falls within the area of common responsibility, the commissioner and the client are liable to each other in proportion to the respective share of fault and / or liability.

- If a party is held responsible by an interested party or by the supervisory authority (liability, damages, fine, etc.), although the violation, which gave rise to the action, falls under the responsibility of the other party, the party responsible is obliged to indemnify the party against whom the action was brought.
- The commissioner and client obligations do not expire with the termination of the contract.

Version: November 2019