



**INFORMATION NOTICE REGARDING THE PROCESSING OF PERSONAL DATA**  
of the CLIENTS of O.P. Agricoli Euro.Com Società Agricola A.R.L.  
(pursuant to Art. 13 of EU Regulation no. 679/2016 or “GDPR”)

Dear Customer,

The company O.P. Agricoli Euro.Com Società Agricola A.R.L., with its registered office in Battipaglia (SA), Via Chiusa Del Bosco 3, Zip Code 84091, Tax Code and VAT number 03988110650, registered with the Salerno Chamber of Commerce under number SA-405109 (hereinafter, also, the “Company” or “Data Controller”), acknowledges the importance of protecting personal data and is committed to processing it responsibly and in compliance with EU Regulation 2016/679 (GDPR) as well as applicable national laws (Legislative Decree 196/2003 or “Privacy Code,” updated by Legislative Decree 101/2018).

To this end, this Information Notice outlines the privacy practices regarding the personal data we collect, use, and, if necessary, share to establish an employment relationship and, if already in place, to manage the same.

To ensure a consistent and high level of protection of these data, we wish to inform you, in your capacity as a Customer and "Data Subject" (i.e., the person to whom the data being processed refers), about the technical and organizational measures adopted by the Company and the essential elements of the operations it carries out.

## 1. DATA CONTROLLER

The Data Controller for the personal data of Clients is O.P. Agricoli Euro.Com Società Agricola A.R.L. For any clarifications and to exercise the rights set forth in Articles 15-22 of the GDPR specified below, the clients of O.P. Agricoli Euro.Com Società Agricola can contact the legal representative of the Company. These rights can be exercised by sending communications to the following addresses:

- Email: [opeurocom@gigapec.it](mailto:opeurocom@gigapec.it)
- Or by sending a registered letter to: O.P. Agricoli Euro.Com Società Agricola, Via Chiusa Del Bosco 3, Zip Code 84091 Battipaglia (SA).
- The updated list of Data Processors and authorized subjects is stored at the registered office of the Data Controller.

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### **O.P. Agricoli Euro.Com Società Agricola A.R.L.**

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## 2. DATA PROCESSED, PURPOSES, AND LEGAL BASIS FOR PROCESSING

Providing data is mandatory for all legal and contractual obligations, and therefore, any refusal to provide them, in whole or in part, may prevent the Company from fulfilling the contract or performing all related obligations.

The data voluntarily provided by the clients of O.P. Agricoli Euro.Com Società Agricola are necessary for the Controller to provide the available services, and will be processed according to the principles of fairness, lawfulness, transparency, confidentiality, and respect for the rights of Clients. These data are also collected and recorded for specified, explicit, and legitimate purposes, and will be used in operations that are not incompatible with these purposes.

The identifying personal data, such as name and surname, company name, tax code, VAT number, address, phone/fax, email, banking and payment details, are collected and processed for the following purposes:

- a) To manage relations with the Client based on pre-contractual and contractual agreements;
- b) For administrative, fiscal, or accounting purposes related to the client-supplier relationship and to fulfill obligations under laws, regulations, community laws, judicial authority requests, or to exercise the Controller's rights (e.g., defense in court);
- c) With your specific and distinct consent, for the following purposes: to send newsletters, updates on the Controller's activities, advertising materials, or commercial communications about products or services offered by the Controller that you may find of interest, and to measure satisfaction with the quality of services, including requests to participate in market analysis or research.

In this case, the data may be processed both by automated means (e.g., email, fax, MMS, SMS, or similar) and traditional methods (e.g., postal mail or calls with operators). d) With your specific and distinct consent, to send newsletters, updates, and information about products offered by the Company. In this case, the data may be processed by both automated means (e.g., email, SMS, or similar) and traditional methods (e.g., postal mail).

The legal basis for the processing of data under points "a" (pre-contractual and contractual agreements) and "b" (administrative, accounting, or fiscal purposes) is the performance of a contract to which the Client is a party, or the performance of pre-contractual activities at the Client's request. For the purposes outlined in points "c" and "d," the legal basis is consent, if freely given by the Client. Therefore, these categories of data can only be processed by the Controller after receiving explicit written consent, expressed by signing this Information Notice.

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### 3. PROCESSING METHODS

Personal data refers to "any information relating to an identified or identifiable natural person, directly or indirectly, with particular reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person" (Art. 4 GDPR).

The processing of personal data will be carried out by the following operations: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, deletion, and destruction of data.

The personal data of Clients will be collected following direct submission to the Controller, via completion of specific forms, including those in contractual documents, or collected by phone by the Controller or a collaborator during pre-contractual activities.

Data will be processed mainly through electronic or computer-based tools, with minimal manual processing in paper format.

Data will be stored in electronic and paper archives and will be kept under control to minimize the risk of destruction, accidental loss, unauthorized access, or processing that does not comply with the purposes for which the data was collected.

The data is processed by the Controller's collaborators, duly instructed in this regard.

### 4. CATEGORIES OF RECIPIENTS

Subject to communications required by law or contract, the data collected and processed by O.P. Agricoli Euro.Com Società Agricola, limited to what is strictly necessary, may be communicated, exclusively for the above purposes, to:

- Collaborators of the Company involved in data processing for the services expressly requested by Clients and other companies of the Pagano group;
- External parties such as professionals, companies, associations, or law firms providing assistance or consultancy to the Controller for administrative, accounting, fiscal, or legal purposes, with whom the Company has established agreements regarding the measures to ensure the security of entrusted data;
- All public institutions established by law and, more generally, all entities designated by applicable accounting and fiscal regulations as recipients of mandatory communications;
- Banking institutions for payments and collections, and to any professionals (individual, joint, or corporate) for market research, payment management via credit cards or electronic payment

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instruments, couriers for delivery or credit recovery activities, and for financial statement certification services;

- Insurance companies, financial intermediaries, and credit institutions;
- Legal entities, both private and public, Chamber of Commerce entities, pension and social security institutions (including INPS, INAIL, Labor Ministry, Tax Offices, Financial Administration, etc.), associations, and other bodies responsible for verifying compliance with the aforementioned purposes.

In any case, unless for the aforementioned purposes, the personal data of Clients will not be subject to dissemination.

## 5. DATA RETENTION PERIOD

The personal data will be retained even after the termination of the employment relationship for the completion of all possible obligations related to or arising from the termination of the employment relationship, in accordance with legal requirements.

Specifically:

1. For purposes described in letters "a" (pre-contractual and contractual agreements) and "b" (administrative, accounting, or fiscal management), Client personal data will be processed and stored by the Controller for the entire duration of the contractual relationship and, upon its termination, for the time required by applicable accounting, fiscal, civil, and procedural regulations.
2. For the purposes described in letters "c" and "d," Client personal data will be processed and stored by the Controller until the Client withdraws consent or exercises the right to object to processing or request deletion of personal data.

## 6. RIGHTS OF THE DATA SUBJECT

Data subjects have the right to obtain from O.P. Agricoli Euro.Com Società Agricola, under the circumstances provided by law, access to their personal data, rectification, deletion, limitation of processing, or opposition to processing (Articles 15 et seq. of the Regulation). Moreover, you may exercise the rights provided under Chapter III of the Regulation at any time. Specifically, data subjects who believe that their personal data are being processed in violation of the GDPR have the right to lodge a complaint with the Supervisory Authority, as provided by Article 77 of the Regulation, or to take appropriate legal action (Article 79 of the Regulation).

## 7. EXERCISE OF RIGHTS

To exercise the rights specified in Articles 15-22 of the GDPR, the Data Subject may contact the Controller using the contact details provided in section 1 of this notice.

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Exercising these rights is free of charge under Article 12 of the GDPR. However, in cases of manifestly unfounded or excessive requests, even if repetitive, the Controller may charge a reasonable fee for administrative costs or refuse to fulfill the request.

## 8. CHANGES

The Controller reserves the right to modify or update the content of this notice, in whole or in part, also due to changes in applicable legislation.

The Controller invites you to regularly visit the privacy section of the website: [www.eurocom.com](http://www.eurocom.com).

Date: January 2025

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