

Data Protection Notice Business Contact

of the Würth Elektronik Italia Srl.

Version September 2023

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

This notice provides you with an overview of the processing of your personal data and your right as pursuant to the General Data Protection Regulation (GDPR) of the European Union.

1. Identity of the Data Protection Controller

The body responsible for data processing:

Name: WUERTH ELEKTRONIK ITALIA SRL
Street: via Trento, 26
Location: 20871 Vimercate (MB) – ITALY

2. Contact data of the Data Protection Officer

Considering that WUERTH ELEKTRONIK ITALIA SRL :

- Is not a public authority or body
- The core activities of the controller or the processor doesn't consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale
- The core activities of the controller or the processor doesn't consist of processing on a large scale of special categories of data pursuant to Article 9 or personal data relating to criminal convictions and offences referred to in Article 10
- Does not fall within the categories referred to in Article 37, paragraph 1 of the GDPR Rules

We decide to not appoint any Data Protection Officer. Nevertheless, for questions and information pertaining to the handling of your personal data, please contact the Data Protection Coordinator of WUERTH ELEKTRONIK ITALIA SRL:

Role: Data Protection Coordinator
Street: via Trento, 26
Location: 20871 Vimercate (MB) – ITALY
Phone: 0039 039 6872723
Email: protezione-dei-dati-italia@we-online.com

3. Collecting and processing of your data provided by you – purpose and legal basis

We collect and process your data for the purpose of initiating a contractual relationship and processing orders. The legal basis for the processing of your data is Article 6 (1) lit. b) GDPR (prior to entering into a contract or necessary for the performance of a contract).

In addition, we use your contact data to send so-called PCNs (Product Change Notification) / PTNs (Product Termination Notice).

This is done to fulfil a contractual obligation pursuant to Article 6 (1) lit. b) GDPR or to safeguard our common interests pursuant to Article 6 (1) lit. f) GDPR.

The legitimate interest lies in the interests of respecting contractual duties of data protection as well as ensuring your early involvement so as to create reliability in planning.

If necessary, we process your data beyond the purposes of the contract to protect legitimate interests as pursuant to Article 6 (1) lit. f) GDPR, to develop and improve our offers and manage business activities. Furthermore, there is a legitimate interest in maintaining risk management within the Group. Within the context of the legitimate interest in accordance with Article 6 (1) lit. f) GDPR, we also use your data to inform you about similar deals and products.

When you make use of free services, such as the download of a white paper/publication provided free of charge, we also obtain your consent in accordance with Art. 6 (1) lit. a) GDPR (consent), for advertising purposes. You therefore consent to us informing you by post, telephone or e-mail about Würth Elektronik products or services. In addition, it is possible that any partner companies that have contributed to the creation of the free service (whitepaper/publication) may also advertise to you via the aforementioned advertising channels. You can unsubscribe your advertising consent at any time at protezione-dei-dati-italia@we-online.com
In case you do not want to receive any more advertising from a partner company, please send your revocation directly to the respective company.

In addition to personal data that we receive directly from you, we also process and collect data for supplementation and validation through our own research in accordance with Art. 14 of GDPR. The legal basis for this is the principle of data accuracy pursuant to Art. 5 para. 1 d GDPR as well as the protection of our legitimate interests for the purpose of verifying and updating our database pursuant to Art. 6 para. 1 lit. f) GDPR. The data is used exclusively within the scope of the purposes stated here

In the event of registration for a Würth Elektronik Italia Srl. event, the data you provide will be used for the purpose of event participation. The data you provide enables us to register you at the event according to your own specifications, to contact you for this purpose and thus to enable the event to run smoothly. The purpose is to make your participation as pleasant as possible for you, to enable exchanges between participants during and after the event, and to provide you with information about products and services (recital 47 of the GDPR). For some events, we may contact you afterwards for promotional purposes. We may use your data for advertising purposes, to inform you about similar deals and products, which is a legitimate interest and in accordance with Art. 6 (1) lit. f) GDPR. In this regard we have carried out the balancing exercise required by data protection law and met general obligations under the GDPR accountability principle. We will process your data to inform you about Würth Electronics products or services by post, telephone or e-mail. The legal basis for this data processing is Art. 6 Art. 1 lit. a) (consent), Art. 6 (1) lit. b) GDPR (fulfilment of a contract) and in any case the existence of a legitimate interest in accordance with Art. 6 (1) lit. f) GDPR.



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For the purpose of preventing corruption, we collect and document your personal data - in particular your first and last name, as well as the company in which you work - in order to be able to provide proof of the avoidance of bribery in business transactions, e.g. for business meals or other business events. The processing of your personal data is carried out in our legitimate interest in accordance with Art. 6 Para. 1 f) GDPR. Our legitimate interest lies in the need for detailed documentation and compliance of relevant transactions.

4. Recipients

WUERTH ELEKTRONIK ITALIA SRL makes use of specialized technical assistance services in the field of technical processing of personal data for order processing. These service providers are carefully selected and legally and contractually required to ensure a high level of data protection. Order processing is conducted in accordance with Article 28 of the GDPR.

We charge a shipping company to complete your order. These companies are legally obliged, like us, to guarantee and observe a high level of data protection.

We share your personal information with third parties for purposes other than those mentioned here, only to the extent that we are legally obliged to do so due to a prevailing legal provision (for example, in the case of an audit).

Participation in the event for free may make it possible for us to pass on your data to the respective organizer for registration purposes. This could also be an international affiliated company within the Würth Elektronik Group in whose country or in whose name the event takes place. These are listed **here**. Würth Elektronik sometimes uses service providers (e.g. technical service providers, etc.) to register for an event and/or as part of the actual implementation (e.g. creating nametags for participants or lists of participants). These service providers are carefully selected, and are legally and contractually obliged to ensure a high level of confidentiality. Your data will be processed in accordance with Art. 28 GDPR.

Depending on your location, it is possible that your contact data may be passed on to the responsible international sister company within the Würth Elektronik eiSos Group to get in contact with you.

5. Data security

The personal data collected and stored by us will be treated confidentially and protected by appropriate technical and organizational measures against loss and modification, as well as unauthorized access by third parties.

6. Duration of storage

We store your personal information for as long as necessary to fulfill our contractual obligations and to achieve the contractual purpose. Furthermore, we comply with the obligations and retention periods established by law or by the authorities. In particular, the data processed in the context of contractual relationships are kept for a period of 10 years from the last invoice issued; the data processed instead for marketing or

information purposes, are kept for a period of 3 years by the last direct contact (order, email, request for offer or information, etc.).

Once these retention obligations and terms have expired, there is a standard procedure for deleting data. If some data are not subject to the aforementioned obligation, they are deleted as soon as their storage is no longer necessary for the intended purpose. It should be noted that the commercial relationship can evolve into a continuous obligation, which can last several years. Even after having reached the contractual or legal obligation, a conservation obligation may remain in force as follows.

Periods of commercial and fiscal preservation: the terms prescribed for storage and / or documentation are up to 10 years after the termination of the business relationship or the completion of a single order.

7. Your rights

If all the legal requirements have been met, you have the right to request access to your personal data or to the processing of data (article 15 GDPR) and the correction, cancellation and limitation of your personal data or data processing (articles from 16 to 18 GDPR) as well as the transfer of personal data (article 20 of the GDPR).

Furthermore, if all the legal requirements have been met, you have the right to object to the processing of your data as provided for by Article 21 of the GDPR, which is based on a "legitimate interest" pursued by the data controller pursuant to Article 6 , paragraph 1. let. f) GDPR.

If you wish to exercise these rights or if you wish to revoke your consent to the processing of personal data, in whole or in part, with effect for the future, please send an e-mail to:

protezione-dei-dati-italia@we-online.com

send a letter to the address indicated to the point 1.

Furthermore, pursuant to Article 77, paragraph 1 of the GDPR, it also has the right to file a complaint with a supervisory authority, in particular in the Member State in which one resides or works or where the alleged violation occurs if one believes that the processing of your personal data is in violation of the GDPR.

Supplementary data protection notices, in particular on your rights to access, rectification, erasure, restriction of processing, data portability, opposition and to lodge a complaint, see our data protection notice at:

www.we-online.com/privacy