

INFORMATION ON DATA PROCESSING EX ART. 13 /ART. 14 REGULATION UE 2016/679

Dear Sirs,

Lombardi Latinoamericana SA considers its Customers, Suppliers and Users' protection personal data as crucial, it guarantees that this data processing, performed in any way, whether automated or manual, is fully performed according to the protections and rights established in the Regulation (EU) 2016/679 relating to the protection of individuals and the processing of their personal data, as well as to the free movement of such data (hereinafter the "Regulation" or "GDPR") and by the additional applicable rules related to the personal data protection.

Lombardi Latinoamericana SA is pleased to provide you with the information below according to Articles 13 and 14 of the GDPR.

1) Data Controller

We inform you that, pursuant to EU Regulation 2016/679 (hereinafter the "Regulation"), your Personal Data will be processed by Lombardi Latinoamerica. with registered office located at 13 Calle 2-60 Zona 10 Edificio Topacio Azul, Nivel 09, oficina 902, GT-Guatemala City- Guatemala email [guatemala@lombardi.group](mailto:guatemala@lombardi.group), as Data Controller ("Data Controller").

2) Nature of the processed data

In compliance with the obligations provided by current legislation and the confidentiality obligations inspiring our Company activity, we inform you that the Data Controller will process the personal data within the definitions set forth in Art. 4(1) of the Regulations, including but not limited to the name, last name, place and date of birth, tax identification number, mobile phone number, address, e-mail, IBAN code and all "Personal Data".

3) Purpose, legal basis and consent for process

Personal Data will be collected directly from the interested party.

Personal Data may also be obtained by the Data Controller to identify or verify the identity of the potential ultimate Data Controller pursuant to the anti-money laundering legislation.

Personal Data will be processed, upon specific consent where applicable, for the purposes listed below:

- a) Enter into a contract, comply with the contractual obligations

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Certified SGS ISO 9001:2015 | CH97/0470  
Certified SGS ISO 14001:2015 | CH16/0455

- b) Management of relations with customers and debt collection activities;
- c) Compliance with legal, accounting, tax obligations and provisions established by public control and supervisory authorities;
- d) Personnel selection;
- e) Marketing and communication (newsletter issue, promotional communications, informative and/or advertising contents related to the Data Controller's activities) subject to consent and in compliance with the laws in force;
- f) Participation of our company and/or Lombardi Group companies in public tenders and in any contract public tender/bid to which a company of the group decides to participate.

The legal basis of the processing for the purposes contained in a), b), is the execution of a contract (art. 6 paragraph 1, letter b) of the Regulation.) Therefore, data provision must be considered mandatory and any refusal to communicate such personal data prevents establishing a contractual/commercial relationship with the Data Controller.

The legal basis of the processing for purposes contained in c) is the compliance with a legal obligation to which the Data Controller is subject (Article 6, paragraph 1, letter c) of the Regulation.) Therefore, data provision must be considered mandatory and any refusal to communicate such personal data prevents establishing a contractual/commercial relationship with the Data Controller.

The legal basis of the processing for the purpose contained in d) and f) is the legitimate interest (article 6, paragraph 1, letter f) of the Regulation) as the processing is required for the performance of the Data Controller's business activity. Data provision for the purposes referred to in point d) is not mandatory, but requires your consent.

The legal basis of the processing for the purpose contained in e) is the Consent (Article 6, paragraph 1, letter a) of the Regulation.) The data provision referred to in letter e) is optional and its refusal does not in any way prevent the execution of the contract.

The Data Controller is able to process the above-mentioned data anonymously and / or in aggregate, according the measures provided by the Privacy Guarantor and under specific exemption given rise by the consent provided by the same Authority, for electronic analysis and processing (e.g. classification of all customers in homogeneous categories based on service levels, projects, expenses, etc.) aimed at periodically monitoring the development and performance of the Owner's activities, guide the relative in-

dustrial and commercial processes, enhancing services, designing and implementing communication campaigns.

#### 4) Processing methods

Personal Data may be processed by the Data Controller through electronic or in any other automatic means (including e-mail, fax, telephone or any other remote communication) according to logic strictly related to the respective purposes or in any case to ensure confidentiality, and the security of Personal Data (focused on the compliance with the use of remote communication techniques.)

#### 5) Communication and spread of data

We inform you that within the limits strictly related to the obligations, duties and purposes stated herein, Personal Data may be "communicated" by us, that is, disclosed to one or more specific individuals, s.s.:

- Individuals authorized by our company to process the Data according to the performance of their duties;
- Individuals from the Lombardi SA Ingegneri Consulenti appointed by our company as System Administrators, so that they may have access to the Data during the their duties performance. The respective names may be requested to the Data Controller;
- General Secretary's Office of the Lombardi SA Ingegneri Consulenti and Lombardi Group companies, within the limits strictly required for Lombardi Group's work organization and, particularly, for the participation of our company and/or Lombardi Group companies to public tenders and all bids which the group decides to participate;
- Third parties requiring to access the Data for purposes related to the contractual relationship with our Company, within the limits strictly required to perform the tasks entrusted to them;
- Professionals hired by our company such as Lawyers, Accountants, Consultants, within the limits required for rendering their professional tasks, subject to verification the adoption of measures to guarantee the confidentiality and security of data processing.

Personal data collected will not be disclosed.

#### 6) Storage of personal data

The Data Controller states that the management and storage of personal data is performed on servers located within the European Union owned and/or available to the Data Controller. The Data Controller is entitled to move the servers within non-EU countries. If required, the transfer of data to countries outside

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the EU will be conducted, in any case, according to the provided in Chapter V GDPR (Article 46 et seq.), based on the suitability decisions of the European Commission or proper guarantees provided by current legislation and/or contractually obtained.

The personal data collected will be kept for no more than the required time to achieve the purposes these were collected and otherwise, for the maximum time envisaged by the applicable legal provisions.

Regarding the data processing for marketing and market research purposes, unless consent is opt-out or revoked, the data will be processed and stored for a reasonable period of time related to the interest shown by the interested party on the Owner's initiatives, which will be periodically verified by the Data Controller.

#### 7) Exercise of the interested party's rights

By an e-mail to [privacy@lombardi.group](mailto:privacy@lombardi.group) the interested party has the right to ask the Data Controller, at any time, access to its Personal Data, the correction or cancellation of the same or to refuse the process, the right to request the limitation of processing when established for by Art. 18 of the Regulation, as well as to obtain in a structured format, commonly used and readable by an automatic device, the data related, in the cases provided by Art. 18 of the Regulation, as well as to obtain in a structured format, commonly used and readable by an automatic device, the data related, in the cases provided by Art. 20 of the Regulation.

At all events, the interested party always has the right to file a complaint before the competent control authority (Guarantor for the Protection of Personal Data), pursuant to Art. 77 of the Regulation, if it deems that the processing of its Data is conducting against the established by the legislation in force.