Privacy notices

SDI website and services

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Milan REA no. 854448 - Milan Companies Register / Tax code 00942610155 - VAT no. IT00942610155

Processing of personal data Privacy notice pursuant to EU Regulation 2016/679

Rev. 01 dated 15/09/2022

Dear User,

s.d.i. automazione industriale S.p.A., as the Controller of your personal data, pursuant to and for the purposes of EU Regulation 2016/679 (hereinafter 'GDPR'), informs you that this legislation provides for the protection of data subjects with regard to the processing of personal data, and that such processing will be guided by the principles of fairness, lawfulness, transparency and protection of your privacy and rights.

Your personal data - provided by completing the contact form on the company website - will be processed in accordance with the statutory provisions of the above legislation and the confidentiality obligations laid down therein.

Purposes and legal basis of the processing.

Your data will be processed for the following purposes connected with compliance with statutory obligations:

- Receiving information or news relating to the company and its products.

Processing methods.

Your personal data will be processed in the following ways:

- processing by means of electronic computers;
- manual processing using paper records.

All processing will be carried out in accordance with the provisions of Articles 6 and 32 of the GDPR and through the adoption of the appropriate security measures provided for therein.

Your data will be processed only by personnel expressly authorised by the Controller and, in particular, by

- SDI employees;

Disclosure

Your data will not be disclosed to external parties.

Retention period.

Please note that, in compliance with the principles of lawfulness, purpose limitation and data minimisation, pursuant to Article 5 of the GDPR, the retention period for your personal data is:

- set for a period no longer than is required to achieve the purposes for which the data are processed in order to perform and fulfil contractual purposes and, in any event, no longer than 10 years from their last use;
- set for a period no longer than is required to perform the services provided and, in any event, no longer than 10 years from their last use;

- set for a period no longer than is required to achieve the purposes for which the data are collected and processed, in compliance with the mandatory periods prescribed by law and, in any event, no longer than 10 years from their last use.

The Data Controller

The Data Controller is s.d.i. automazione industriale S.p.A. (Viale Edison 10, 20090 Trezzano S/N (MI); VAT number: 00942610155, tel. 02/48.48.61), represented by its legal representative for the time being. The Data Controller has in turn appointed a Data Processor who can be contacted at: m.dechirico@sdiautomazione.it

You have the right to obtain from the Controller the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, and to object to their processing. More generally, you may exercise all the rights provided for in Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Data subjects' rights

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning them exist, even if not yet recorded, to have those data communicated in an intelligible form, and to lodge a complaint with the supervisory authority.

2. The data subject has the right to obtain information on:

a. the source of the personal data;

b. the purposes and methods of the processing;

c. the logic applied where processing is carried out with the assistance of electronic tools;

d. the identity of the Controller, the processors and the representative appointed pursuant to Article 5, paragraph 2;

e. the parties or categories of parties to whom the personal data may be disclosed or who may become aware of them in their capacity as representatives appointed within the territory of the State, processors or persons in charge of processing.

3. The data subject has the right to obtain:

a. the updating, rectification or, where they have an interest, completion of the data;

b. the erasure, anonymisation or blocking of data processed unlawfully, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;

c. confirmation that the operations referred to in points a) and b), including their content, have been brought to the attention of those to whom the data have been disclosed or disseminated, unless this proves impossible or involves the use of means manifestly disproportionate to the right being protected; d. data portability.

4. The data subject has the right to object, in whole or in part:

a. on legitimate grounds, to the processing of personal data concerning them, even if relevant to the purpose of their collection;

b. to the processing of personal data concerning them for the purpose of sending advertising material or direct sales, or for carrying out market research or commercial communications.

Cookies Policy: Extended cookie notice for the website www.sdiautomazione.com/

13/01/2023

1. Introduction

The Data Controller is s.d.i. automazione industriale S.p.A. (Viale Edison 10, 20090 Trezzano S/N (MI); VAT number: 00942610155, tel. 02/48.48.61), represented by its legal representative from time to time. The Data Controller has, in turn, appointed a Data Processor who can be contacted at: m.dechirico@sdiautomazione.it

As Controller, the Company provides this Cookies Policy, a notice concerning the processing of cookies collected on the website accessible at the URL www.sdiautomazione.com/

For any matters not covered by the Cookies Policy, please refer to the privacy notice published on the Website concerning data processing.

2. Definitions

Visitor:

any person who browses the Website and can use the services offered by the Controller;

Cookie:

a cookie is a file consisting of a single line of text, which may be stored temporarily in the memory of the Visitor's computer (a session or temporary cookie) and placed on the hard drive by a web page server (a "long-lasting" cookie).

Data: anonymous browsing data relating to the Visitor, as further specified below;

2.1 Definition of the third-party cookies used on the website www.sdiautomazione.com/
Category: Displaying content from external platforms

Google Maps Widget:

Google Maps is a map display service operated by Google Inc. that allows this Application to incorporate such content into its pages.

Personal data collected: Cookies and Usage Data.

Place of processing: USA

Privacy Policy www.google.it/intl/it/policies/privacy/

Vimeo Video (Vimeo, LLC)

Vimeo is a video content display service operated by Vimeo, LLC that allows this Application to incorporate such content into its pages.

Personal data collected: Cookies and Usage Data.

Place of processing: USA

Privacy Policy: vimeo.com/privacy

Video Widget Youtube (Google Inc.)

Youtube is a video content display service operated by Google Inc. that allows this Application to incorporate such content into its pages.

Personal data collected: Cookies and Usage Data. Place of processing: USA

Privacy Policy: www.google.it/intl/it/policies/privacy

3. Processing methods

The Website does not use the Controller's long-lasting (profiling) Cookies, because the Website does not allow authentication or sales procedures, nor does it carry out any activity to personalise the information offered to Visitors.

4. Purpose.

Session Cookies are used to enable the efficient operation of the website: to identify the browsing session and to manage the display of the cookie information message and the Visitor's related choice. In addition, the Data generated by Cookies are used by the Controller as a tool to support internal analysis and monitoring of the traffic generated by visitors (in particular, visits and page views), and to make improvements to operation and navigation and also to provide additional features.

5. Content.

Session Cookies are strictly limited to the transmission of session identification Data consisting of random numbers generated by the server, which do not allow any personal identification of individual Visitors.

6. Duration.

Session cookies are not stored persistently on the Visitor's computer and disappear when the browser is closed.

7. Responsibility.

The Controller undertakes to use the Data generated by Cookies exclusively for the purposes specified above.

The Controller is not responsible for the processing of Data carried out by Third Parties using the system described above, and merely takes note of the assurances provided by them that they comply with the data protection provisions of the 'Safe Harbor Principles' and participate in the 'Safe Harbor' programme of the US Department of Commerce.

The Data generated by Cookies concerning the Visitor's use of the Website (including the IP address) are transmitted to and stored on the service providers' servers.

8. Consequences of refusing processing

To refuse Cookies, the Visitor must follow the appropriate procedure for their Web Browser, which allows cookies to be restricted and deleted. For further information on managing cookies, please consult the relevant information pages for the main browsers listed below:

Internet Explorer

Microsoft Edge

Firefox

Google Chrome

Safari

Disabling cookies does not significantly limit the usability of the Website, but hinders the Controller in pursuing the purpose described above.

9. Exercise of rights by Users

Data subjects have the right at any time to obtain confirmation of whether or not their Personal Data are held by the Data Controller, to learn their content and origin, to verify their accuracy or to request the erasure, updating, rectification, anonymisation or blocking of Personal Data

processed unlawfully, and in any event to object to their processing on legitimate grounds. Requests must be addressed to the Data Controller.

This Application does not support “Do Not Track” requests.

To find out whether any third-party services used support them, please consult their Cookies Policies.

10. Changes to the Cookies Policy

The Data Controller reserves the right to make changes to this Cookies Policy at any time by notifying Users on this page. Please therefore consult this page, referring to the date of the last update indicated at the bottom. If you do not accept the changes made to this Cookies Policy, you must stop using this website and may ask the Data Controller to remove your Personal Data. Unless otherwise specified, the previous Cookies Policy will continue to apply to the Personal Data collected up to that point.

11. Information about this Cookies Policy

The Data Controller is responsible for this Cookies Policy.

12. Legal references

This cookie notice has been drawn up to comply with the obligations provided for in 10 of Directive No. 95/46/CE, as well as the provisions of Directive 2002/58/CE, as updated by Directive 2009/136/CE, concerning Cookies.

Privacy notice on the processing of personal data of external users of SDI Microsoft 365 services

Rev. 1.0 dated 11/11/2026

1. Data Controller and contact details

SDI S.p.A., with registered office at Viale Edison 10, Trezzano sul Naviglio (MI), VAT number 00942610155, is the controller of the personal data processing described in this privacy notice.

For information on the processing of personal data and to exercise your rights, you may write to the Data Protection Officer (DPO), Marcello De Chirico, at m.dechirico@sdiautomazione.it.

2. Who this privacy notice is for

This privacy notice concerns individuals external to SDI, such as representatives of customers, suppliers, consultants and partners, who are invited to access documents, folders or other collaboration spaces made available by SDI through Microsoft 365.

It applies to the processing carried out by SDI to enable and manage such access and to protect shared resources. It supplements any other privacy notices received in connection with your relationship with SDI. The services concerned are OneDrive, SharePoint and Teams.

3. What data we process and where it comes from

For the purposes described below, SDI processes the categories of data relevant to the services used:

- **Identification and profile data:** first name, surname, email address, organisation, account and home organisation identifiers, and any profile picture made available.
- **Invitation and authorisation data:** invited email address, status and date of acceptance of the invitation, accessible resources, assigned permissions and any changes to them.
- **Technical access data:** date and time, authentication outcome, IP address and information on the browser or device, to the extent actually collected.
- **Data on activities in SDI resources:** events relating to access, viewing, downloading, uploading, editing, deleting or sharing documents, depending on the features used and permissions assigned.
- **Collaboration content:** personal data contained in documents, comments and other content entered or shared by the user in SDI spaces.

The data comes from the user, the person inviting them, the organisation or service managing their identity, and the systems generating technical events during use.

4. Why we process data and on what legal bases

SDI processes personal data for the purposes and on the legal bases set out below.

Access management. Inviting the user, identifying them and allowing them to access authorised resources. The legal basis is the legitimate interests of SDI and the user's organisation in

managing professional relationships and exchanging information securely, pursuant to Article 6(1)(f) GDPR.

Professional collaboration. Enabling the exchange of documents and collaboration with SDI. The legal basis is the legitimate interests of SDI and the user's organisation in carrying out their respective professional activities, pursuant to Article 6(1)(f) GDPR. Where the user is personally a party to a contract with SDI and the processing is necessary for its performance, or for pre-contractual steps requested by the user, Article 6(1)(b) GDPR applies.

Security and support. Protecting accounts and information, preventing unauthorised access, detecting and managing incidents, and resolving technical problems. The legal basis is SDI's legitimate interest in the security of its resources and continuity of its services, pursuant to Article 6(1)(f) GDPR.

Legal obligations and protection of rights. For compliance with obligations imposed by applicable legislation, the legal basis is Article 6(1)(c) GDPR. For the establishment, exercise or defence of a right, the legal basis is SDI's legitimate interest in protecting its rights, pursuant to Article 6(1)(f) GDPR.

5. Meaning of the authorisations displayed during sign-in

On first access, the user may see a Microsoft screen asking them to authorise SDI to receive profile data and to collect, record and use information about activities. In the context of the services described, these terms refer to the data and purposes set out in sections 3 and 4.

Accepting this screen allows the sign-in process to be completed. It does not, in itself, constitute general consent to any use of personal data.

6. Need for the data and consequences of not providing it

The identification and technical data necessary for authentication, authorisation management and security is required to allow access to shared resources. Failure to provide it or to complete the procedure may prevent use of those resources.

To consider alternative ways of exchanging documents, the user may contact their SDI contact person.

External access to SharePoint and OneDrive resources requires the authentication or identity verification provided by the service. Sharing through anonymous "Anyone" links is disabled at organisation level; the default link type is "Specific people".

7. Who can access the data

The data is accessible to authorised SDI personnel within the scope of their respective duties. Some identification data and the user's contributions may be visible to other participants in the collaboration spaces accessed by the user; owners of OneDrive files may also see the names of the people who have viewed them and, in SharePoint, site owners may enable the display of the names of visitors to files and pages.

SDI uses Microsoft to provide the services. For processing carried out on behalf of SDI, Microsoft acts as a processor within the limits set out in the applicable Microsoft Products and Services Data Protection Addendum (DPA). Any processing for which Microsoft independently determines the purposes and means is governed by the relevant Microsoft terms and privacy notices.

The DPA governs the provider's processing and security obligations. The appointment of a processor pursuant to Article 28 GDPR does not replace the legal bases set out in section 4 or the safeguards required for any international transfers.

SDI's ICT system administrators may also access the data, to the extent necessary for the services entrusted to them and subject to the obligations laid down by applicable legislation.

The data may also be disclosed to authorities or other parties where there is a legal obligation or another valid legal basis.

8. Where data is processed and international transfers

For data at rest, the location shown in SDI's Microsoft 365 portal for OneDrive, SharePoint and Microsoft Teams is the European Union/EFTA region. This indication does not guarantee that every processing operation or access takes place exclusively within the European Union.

Microsoft's EU Data Boundary commitments have documented scopes and exceptions, including limited circumstances involving transfers outside the region.

Any transfers to countries outside the European Economic Area are based on applicable adequacy decisions or appropriate safeguards provided for by the GDPR, including the European Commission's standard contractual clauses, in accordance with the agreements and terms actually applicable. For information on the safeguards and to obtain a copy, you may contact SDI at the address given in section 1.

9. How long we retain data

Data is retained for as long as necessary for its respective purposes. The duration of access authorisations is separate from the retention of accounts, logs and content, as specified below.

Guest access. For guest access to SharePoint and OneDrive subject to the company policy, SDI has enabled automatic expiry after 60 days, with the possibility of an extension by site owners where collaboration needs to continue. The policy applies to the affected sharing links and direct permissions granted after it was enabled; it does not automatically cause membership of Microsoft 365 groups or Teams to expire, or delete the guest account or content.

Guest invitations and profiles. Data necessary to manage the profile is retained for the duration of the collaboration and for the subsequent period necessary to close it and review permissions, unless there are further legitimate retention needs.

Unaccepted invitations and guest accounts that are no longer needed (not used for more than 60 days) are deleted through a review procedure carried out annually by ICT.

Entra authentication and audit logs. With Microsoft Entra ID Free, the documented native retention period for authentication and audit logs is 7 days. No additional exports or archiving are carried out.

Microsoft 365 activity logs. The standard retention period in Microsoft Purview Audit (Standard) is 180 days. Events generated by guest users are subject to the period provided for by the licences and retention policies actually applicable.

Documents and contributions. Content is retained for the duration of the relationship or project to which it relates and, subsequently, for the periods necessary to comply with legal obligations and protect rights applicable to the relevant document category.

Recovery copies and backups. No backups or recovery copies are provided for data exchanged within the collaboration spaces.

Any further retention for legal obligations or disputes is limited to the data and period necessary. Revocation of access does not necessarily result in the immediate deletion of documents, contributions and logs that are still lawfully retained.

10. Data subject rights

In the cases and within the limits provided for by the GDPR, the user may request access to their data, rectification, erasure, restriction of processing and data portability.

For processing based on legitimate interests, the user may object on grounds relating to their particular situation. Where processing is based on consent, they may withdraw it at any time, without affecting the lawfulness of processing carried out before withdrawal.

Requests may be sent to m.dechirico@sdiautomazione.it. The user also has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali).

Privacy notice under Articles 13-14 of Regulation (EU) 2016/679

(updated 15/09/2022)

Data subjects: customers.

SDI SpA, as the Controller of your personal data, pursuant to and for the purposes of Regulation (EU) 2016/679, hereinafter the 'GDPR', hereby informs you that this legislation protects data subjects with regard to the processing of personal data and that such processing will be based on the principles of fairness, lawfulness, transparency and the protection of your privacy and rights.

Your personal data will be processed in accordance with the provisions of the above legislation and the confidentiality obligations set out therein.

Purposes and legal basis of processing.

Your data will be processed for the following purposes connected with compliance with statutory obligations:

- Administration and management of quotations, contracts, orders and invoices;
- Mandatory tax and accounting compliance;
- Management of relationships during quotation and sales activities, and planning of the related activities;
- Planning and monitoring of activities.

Processing methods.

Your personal data will be processed in the following ways:

- processing using electronic computers;
- manual processing using paper-based records.

All processing will comply with the requirements of Articles 6 and 32 of the GDPR and will involve the adoption of the appropriate security measures provided for therein.

Your data will be processed only by personnel expressly authorised by the Controller and, in particular, by

- SDI employees;

Disclosure

Your data will not be disclosed to external parties.

Retention period.

Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimisation under Article 5 of the GDPR, the retention period for your personal data is:

- set for a period no longer than necessary to achieve the purposes for which the data are processed in order to perform and fulfil the contractual purposes and, in any event, no longer than 10 years after their last use;

- set for a period no longer than necessary to provide the services and, in any event, no longer than 10 years after their last use;
- set for a period no longer than necessary to achieve the purposes for which the data are collected and processed, in compliance with the mandatory periods prescribed by law and, in any event, no longer than 10 years after their last use.

The Controller

The Controller is SDI SpA (Viale Edison 10, 20090 Trezzano S/N (MI); VAT number: 00942610155, tel. 02/48.48.61), acting through its legal representative. In turn, the Controller *has appointed a Data Processor who may be contacted at: m.dechirico@sdiautomazione.it*

You have the right to obtain from the Controller the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to the processing of your personal data, and, in general, to exercise all the rights provided for in Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the data subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning them exist, even if not yet recorded, to receive such data in an intelligible form, and to lodge a complaint with the supervisory authority.

2. The data subject has the right to obtain information on:

a. the origin of the personal data;

b. the purposes and methods of processing;

c. the logic applied where processing is carried out using electronic tools;

d. the identification details of the Controller, the Processors and the representative designated pursuant to Article 5, paragraph 2;

e. the parties or categories of parties to whom personal data may be disclosed or who may become aware of such data in their capacity as the designated representative within the territory of the State, as Processors or as persons authorised to process the data.

3. The data subject has the right to obtain:

a. the updating, rectification or, where they have an interest in doing so, completion of the data;

b. the erasure, anonymisation or blocking of data processed unlawfully, including data whose retention is not necessary in relation to the purposes for which they were collected or subsequently processed;

c. confirmation that the operations referred to in points a) and b), including their contents, have been notified to those to whom the data were disclosed or disseminated, unless this proves impossible or involves a manifestly disproportionate use of resources in relation to the right protected;

d. data portability.

4. The data subject has the right to object, in whole or in part:

a. on legitimate grounds, to the processing of personal data concerning them, even where relevant to the purpose of collection;

b. to the processing of personal data concerning them for the purpose of sending advertising materials, direct selling, market research or commercial communications.

Privacy notice under Articles 13-14 of Regulation (EU) 2016/679

(updated 15/09/2022)

Data subjects: suppliers

Sdi SpA, as the Controller of your personal data, pursuant to and for the purposes of Regulation (EU) 2016/679, hereinafter the 'GDPR', hereby informs you that this legislation protects data subjects with regard to the processing of personal data and that such processing will be based on the principles of fairness, lawfulness, transparency and the protection of your privacy and rights.

Your personal data will be processed in accordance with the provisions of the above legislation and the confidentiality obligations set out therein.

Purposes and legal basis of processing.

Your data will be processed for the following purposes connected with compliance with statutory obligations:

- Administration and management of quotations, contracts, orders and invoices;
- Mandatory tax and accounting compliance;
- Management of relationships during purchasing activities and planning of the related activities;
- Planning and monitoring of activities;
- Where necessary, management of occupational health and safety.

Processing methods.

Your personal data will be processed in the following ways:

- processing using electronic computers;
- manual processing using paper-based records.

All processing will comply with the requirements of Articles 6 and 32 of the GDPR and will involve the adoption of the appropriate security measures provided for therein.

Your data will be processed only by personnel expressly authorised by the Controller and, in particular, by

- Sdi employees.
- Only in the case of subcontracting will the data required by law be disclosed to the customer involved in authorising the subcontracting.

Disclosure

Your data will not be disclosed to external parties. Only in the case of subcontracting will the data required by law be disclosed to the customer involved in authorising the subcontracting.

Retention period.

Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimisation under Article 5 of the GDPR, the retention period for your personal data is:

- set for a period no longer than necessary to achieve the purposes for which the data are processed in order to perform and fulfil the contractual purposes and, in any event, no longer than 10 years after their last use;
- set for a period no longer than necessary to provide the services and, in any event, no longer than 10 years after their last use;
- set for a period no longer than necessary to achieve the purposes for which the data are collected and processed, in compliance with the mandatory periods prescribed by law and, in any event, no longer than 10 years after their last use.

The Controller

The Controller is Sdi SpA (Viale Edison 10, 20090 Trezzano S/N (MI); VAT number: 00942610155, tel. 02/48.48.61), acting through its legal representative. In turn, the Controller has appointed a Data Processor who may be contacted at: m.dechirico@sdiautomazione.it

You have the right to obtain from the Controller the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to the processing of your personal data, and, in general, to exercise all the rights provided for in Articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the data subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning them exist, even if not yet recorded, to receive such data in an intelligible form, and to lodge a complaint with the supervisory authority.

2. The data subject has the right to obtain information on:

a. the origin of the personal data;

b. the purposes and methods of processing;

c. the logic applied where processing is carried out using electronic tools;

d. the identification details of the Controller, the Processors and the representative designated pursuant to Article 5, paragraph 2;

e. the parties or categories of parties to whom personal data may be disclosed or who may become aware of such data in their capacity as the designated representative within the territory of the State, as Processors or as persons authorised to process the data.

3. The data subject has the right to obtain:

a. the updating, rectification or, where they have an interest in doing so, completion of the data;

b. the erasure, anonymisation or blocking of data processed unlawfully, including data whose retention is not necessary in relation to the purposes for which they were collected or subsequently processed;

c. confirmation that the operations referred to in points a) and b), including their contents, have been notified to those to whom the data were disclosed or disseminated, unless this proves impossible or involves a manifestly disproportionate use of resources in relation to the right protected;

d. data portability.

4. The data subject has the right to object, in whole or in part:

a. on legitimate grounds, to the processing of personal data concerning them, even where relevant to the purpose of collection;

b. to the processing of personal data concerning them for the purpose of sending advertising materials, direct selling, market research or commercial communications.