PERSONAL DATA PROCESSING NOTICE

(compliant with Articles 13 and 14 of Regulation (EU) 2016/679)

This notice describes how single-shareholder company ORTECO S.r.l. processes the personal data it collects as part of its relations with customers, potential customers, and their respective points of contact; this update replaces all previous versions.

1. Data controller identity and contact details

The data controller is single-shareholder company ORTECO S.r.l. (represented by the company's legal representative), with registered and operational office located at Via 2 Giugno no. 19, Anzola dell'Emilia (BO), 40011, Italy. The data controller may be contacted via email at privacy@orteco.com.

2. Categories of personal data processed

Depending on the specific processing purpose, the following data may be processed:

- identification and contact details of customers, potential customers, and individuals acting on their behalf, such as first name, surname, position, company, address, telephone number, and email address;
- administrative, contractual, tax, and accounting data relating to the relationship with the customer;
- data relating to preferences expressed regarding commercial communications.

3. Purpose, lawful basis, and retention period

Purpose	Lawful basis	Retention period
Management of the contractual relationship and pre-contractual measures.	Performance of a contract or pre-contractual measures (Art. 6. 1.b, GDPR).	Throughout the relationship and for 10 years following the end of the relationship, unless required otherwise to protect legal rights.
Compliance with legal obligations of an administrative, accounting, civil and tax nature.	Compliance with a legal obligation (Art. 6.1.c, GDPR).	Ten years or any other term established by applicable law.
Sending customers emails concerning products or services similar to those already purchased (subject to legal limits).	Art. 130.4 of the Italian Data Protection Code, without prejudice to the right to object.	Until the data subject files an objection.
Sending commercial, information, and marketing emails concerning products, services, events, trade fairs, news, and initiatives by ORTECO.	Consent (Art. 6.1.a), GDPR.	Until consent is withdrawn and, in any case, in accordance with the retention periods adopted by the data controller.

4. Nature of the provision of data and consequences of failure to provide

The provision of data required to manage the relationship and comply with legal obligations is necessary by nature; failure to provide such data may make it impossible to establish or continue the relationship. Consent for commercial communications is optional and failure to provide such consent has no impact on the contractual relationship.

5. Processing methods

Your data is processed using paper-based, electronic, digital, and telecommunication tools, in accordance with the principles of lawfulness, fairness, transparency, data minimisation, and security.

6. Data recipients and authorised processors

Your data may be processed by authorised ORTECO personnel and, as needed, disclosed to third-party providers of administrative, accounting, legal, IT, hosting, contact management, email distribution, in which case such third parties are appointed as data processors where required. Your data may also be disclosed to other parties in the public or private sector when required by law or when necessary to protect the data controller's rights. An up-to-date list of data processors is available from the data controller. Your data is not disseminated.

7. Data processing location and international transfer

Your data is processed within the European Economic Area. If, as a result of any of the suppliers used, your data is transferred to third countries, ORTECO ensures that your data is transferred in compliance with Articles 44 et seq. of the GDPR, based on an adequacy decision or other appropriate applicable safeguards.

8. Rights of the data subject

Where applicable, the data subject may exercise the rights provided for under Articles 15-22 of the GDPR, including the right to access, rectify, erase, restrict processing, transfer your data, and object to processing. The data subject may also withdraw their consent to marketing at any time without affecting the lawfulness of any processing carried out prior to such withdrawal.

Data subjects can exercise these rights simply by emailing Orteco at privacy@orteco.com. The data subject may also lodge a complaint with the Italian data protection authority.

9. Update

This notice was last updated on 10 November 2026.