



Armeria Piovanelli S.r.l.

Via C. Battisti, 19
25017 Lonato del Garda (BS)

INFORMATION NOTICE ON PERSONAL DATA PROCESSING ADDRESSED TO OUR SUPPLIERS

Pursuant to articles 13 and 14 of Regulation (EU) 2016/679 " on the protection of natural persons with regard to the processing of personal data, as well as to the free movement of such data " (hereinafter referred to as "GDPR")

WHEREAS

- In accordance with art. 4, paragraph 1, point 7 of Regulation (EU) 2016/679 the "Data Controller" is the natural or legal person, the public authority, the agency or other body which, individually or together with others, determines the purposes and means of personal data processing;
- In accordance with art. 4, paragraph 1, point 1 of Regulation (EU) 2016/679 "Personal Data" means any information relating to an identified or identifiable natural person («data subject»);
- In compliance with art. 14, paragraph 3 of Regulation (EU) 2016/679 in the case of relationships between legal persons, any data subjects involved in the related processing will be provided with the information notice through the customer (legal person) at the time of the first communication with them

NOW, THEREFORE

We inform you that the fulfillment of supply contract implies the need to process some information concerning natural persons.

We want, however, to reassure you about the handling of such information, which will be processed by *ARMERIA PIOVANELLI S.R.L.*, with registered office in *Via Cesare Battisti n. 19 25017 Lonato (BS)* VAT No. *00717140982*, Telephone number *+39 030 9130076*, e-mail address amministrazione@piovanelli.com, as **Data Controller**, in compliance with the fundamental rights and freedoms of the individual, as well as the provisions of the legislation on the protection of personal data.

DATA SOURCE AND TYPE OF DATA WE PROCESS

The supply contract management implies the collection and processing of personal data, namely: identification (name, surname, e-mail address), administrative, accounting and tax ones, directly related to the supplier (natural person) or, as regards identification and contact data, those referred to further data subjects (such as managers, directors, employees, contact persons, collaborators, etc.). These data are generally collected within the scope of execution and performance of relationships with the data controller and according as well as in compliance with the provisions on the processing and protection of personal data

The aforementioned data are essential to allow the establishment of the contractual relationship: without prejudice to your right not to provide us with such information, however, in this latter case, it may not be possible to continue the supply relationship.

PURPOSES OF PROCESSING

The data collected are used by the Data Controller to fulfill the operational and functional purposes of the current contractual or pre-contractual relationship with the supplier, in full compliance with the principle of fairness and lawfulness as well as the legal provisions. In particular, processing is aimed at:

- Registration of the new Supplier's personal data and operator's contact data in the management software.
- Internal communication aimed at correct fulfillment of the supply.
- Invoicing, accounting and financial statements issuing.

In the event the data controller intends to further process personal data for a purpose other than the one for which they were collected, he will provide the interested party with all necessary information in advance.

The Data Controller will not use the contact data collected for newsletter delivery.

The Data Controller will not carry out any profiling activities aimed at direct marketing.

LEGAL BASIS OF THE PROCESSING

The processing is carried out so as to perfect and fulfill a contract of which the Supplier is a party or current pre-contractual measures within the relationship between the Data Controller and the Supplier, and having as their object the supply of the product or of the service.

In case it is provided by a sector-specific regulation (e.g. tax or anti-money laundering domains), the processing of invoicing data, with reference to natural persons, will be performed on the basis of a regulatory obligation which the Data Controller is required to comply with.

RETENTION PERIOD

The personal data collected will be retained for the time strictly necessary to the fulfillment of the supply contract, including the time for the delivery of the product. The Data Controller may continue to retain such Data for a longer period in order to handle any complaint related to the supply.

Processing for administrative and accounting purposes entails a retention period according to the terms established by law: 10 years, pursuant to art. 2220 of the Italian Civil Code. In these cases, only the data strictly necessary for these purposes will be retained.

HOW WE PROCESS PERSONAL DATA

The data collected are processed in electronic, telematic on paper form with logic strictly related to the declared purposes and in any case in order to ensure the security and confidentiality thereof. The filing of the documentation is carried out both electronically and on paper. Some essential information is given below:

- The collection of personal data is limited to the minimum required for any specific purpose of the processing.
- The processing of personal data is limited to the purposes for which they are collected.
- The storage of personal data is limited to the minimum required for any specific purpose of the processing.
- Special categories of personal data that may be collected and processed electronically are stored in encrypted form.
- No personal data are provided to commercial third parties.
- No sale or rental of personal data are performed.

SCOPE OF DISSEMINATION AND CATEGORIES OF RECIPIENTS TO WHOM PERSONAL DATA HAVE BEEN DISCLOSED

The processing operations are carried out by subjects specifically appointed by the Data Controller with a written deed or otherwise authorized to access the information, who are appropriately trained on personal data processing. In pursuit of the aforementioned purposes the Data Controller may disclose some of the data collected to external companies, from time to time identified as autonomous data controllers or data processors: adequate measures will be taken to ensure the protection of personal data. Below, we provide a list of categories of subjects who, in pursuit of the aforementioned purposes, could become aware of some categories of data provided:

- Subjects to whom the disclosure is provided by the Statute, by law, by regulation or by national and European Union legislation, as well as, for the fulfillment of contractual or pre-contractual obligations,
- Advisors dealing with tax obligations on behalf of the Data Controller appointed for this purpose as External Data Controllers,
- Banks, credit institutions and companies closely related to debt collection
- Legal advisors (e.g. credit recovery and contractual advice),
- IT companies, appointed for this purpose as external Data Controllers, insofar as they have access to the information systems within the conduct of their maintenance activities.

The personal data collected will not be transferred to extra-EU countries



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DATA OF INTERESTED PARTIERS

At any time the interested party can exercise its rights towards the Data Controller, pursuant to Regulation (EU) 2016/679 through the following contact details: Armeria Piovanelli S.r.l. *Via Cesare Battisti n. 19 25017 Lonato (BS) VAT No. 00717140982, Telephone number +39 030 9130076, e-mail address amministrazione@piovanelli.com* (for written communications), in person of its *pro tempore* legal representative. To ensure the correct exercise of the rights, the data subject must render himself unequivocally identifiable. The organisation undertakes to provide feedback within 30 days and, in the event of impossibility to meet these times, to account for any extension of the deadline. The feedback will be free of charge except in cases of groundlessness (eg. there are no data concerning the interested party) or excessive requests (eg. repeated over time) for which a cost contribution can be charged. The rights relating to personal data concerning deceased persons can be exercised by those who have their own interest or act to safeguard the data subject or for family reasons worthy of protection. In addition the data subject can lodge a complaint with a supervisory authority. In case of personal data breach suffered by the organisation, the Data Controller notifies the breach to data protection supervisory authority in charge within 72 hours from the event and will also communicate the occurrence to the data subject, except for the cases of exclusion set forth by the law

Namely, the interested party has the right to obtain the information on:

- Origin of personal data;
- Categories of processed data;
- Purposes and methods of processing;
- Retention period;
- Logic applied in case of treatment carried out with the aid of electronic instruments;
- Identifying details of the Data Controller;
- Subjects or the categories of subjects to whom data can be disclosed or who may become aware thereof as processors or authorized subjects;
- Existence of profiling processes.

Besides that, the interested party will always have the right to obtain:

- confirmation of the existence or not of their personal data and that these data are made available in an intelligible form;
- updating, rectification, integration of data and limitation thereof;
- erasure, transformation into anonymous form or blocking of data processed unlawfully (including those for which retention is not necessary in relation to the purposes for which they were collected or subsequently processed);
- attestation that the operations referred to in the points above have also been brought to the notice of those to whom the data have been disclosed or disseminated, except in the case where such fulfillment turns out to be impossible or implies the use of means manifestly disproportionate compared to the protected right of the organization;
- copy of the processed data.

Data Subjects have the right to lodge a complaint with the Supervisory or bring a lawsuit for the protection of their rights.

OBJECT: **INFORMATION NOTICE PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679**
" on the protection of natural persons with regard to the processing of personal data, as well as to the free movement of such data " (hereinafter referred to as "GDPR")

Whereas

- In accordance with art. 4, paragraph 1, point 7 of Regulation (EU) 2016/679 the "Data Controller" is the natural or legal person, the public authority, the agency or other body which, individually or together with others, determines the purposes and means of personal data processing;
- In accordance with art. 4, paragraph 1, point 1 of Regulation (EU) 2016/679 "Personal Data" means any information relating to an identified or identifiable natural person («data subject»);
- In compliance with art. 14, paragraph 3 of Regulation (EU) 2016/679 in the case of relationships between legal persons, any data subjects involved in the related processing will be provided with the information notice through the customer (legal person) at the time of the first communication with them

Now, therefore

We inform you that the fulfillment of your order implies the need to process some information concerning natural persons.

We want, however, to reassure you about the handling of such information, which will be processed by *ARMERIA PIOVANELLI S.R.L.*, with registered office in *Via Cesare Battisti n. 19 25017 Lonato (BS)* VAT No. *00717140982*, Telephone number *+39 030 9130076*, e-mail address amministrazione@piovanelli.com, as **Data Controller**, in compliance with the fundamental rights and freedoms of the individual, as well as the provisions of the legislation on the protection of personal data.

What type of data we process

The supply contract management implies the collection and processing of personal data, namely: identification (name, surname, e-mail address), administrative, accounting and tax ones, directly related to the supplier (natural person) or, as regards identification and contact data, those referred to further data subjects (such as managers, directors, employees, contact persons, collaborators, etc.). These data are generally collected within the scope of execution and performance of relationships with the data controller and according as well as in compliance with the provisions on the processing and protection of personal data

The aforementioned data are essential to allow the establishment of the contractual relationship: without prejudice to your right not to provide us with such information, however, in this latter case, it may not be possible continue the supply relationship

Why we process personal data

The data collected are used by the Data Controller to fulfill the operational and functional purposes of the current contractual or pre-contractual relationship with the supplier, in full compliance with the principle of fairness and lawfulness as well as the legal provisions.

The Data Controller will not use the contact data collected for newsletter delivery.

The Data Controller will not carry out any profiling activities aimed at direct marketing.

Legal basis and retention period

The processing is carried out so as to perfect and fulfill a contract of which the Supplier is a party and having as its object the supply of the product or of the service.

In case it is provided by a sector-specific regulation (e.g. tax or anti-money laundering domains), the processing of invoicing data, with reference to natural persons, will be performed on the basis of a regulatory obligation which the Data Controller is required to comply with.

The personal data collected will be retained for the time strictly necessary to the fulfillment of the supply contract, including the time for the delivery of the product. The Data Controller may continue to retain such Data for a longer period in order to handle any complaint related to the supply.

Processing for administrative and accounting purposes entails a retention period according to the terms established by law: 10 years, pursuant to art. 2220 of the Italian Civil Code. In these cases, only the data strictly necessary for these purposes will be retained

How we process data

The collected data are stored in a management software and are processed in electronic and paper form, always in compliance with the principles established by the legislation on the protection of personal data.

The treatment takes place after the adoption of every security, technical and organizational measure, adequate to the risks for the fundamental rights and freedoms of the interested parties.

The processing operations are carried out by subjects specifically appointed by the Data Controller with a written deed or otherwise authorized to access the information, who are appropriately trained on personal data processing

Recipients of the disclosure

In pursuit of the aforementioned purposes the Data Controller may disclose some of the data collected to external companies, from time to time identified as autonomous data controllers or data processors: adequate measures will be taken to ensure the protection of personal data. Below, we provide a list of categories of subjects who, in pursuit of the aforementioned purposes, could become aware of some categories of data provided:

- Advisors dealing with tax obligations on behalf of the Data Controller.
- Banks, credit institutions and companies closely related to debt collection
- Legal Advisors appointed for this purpose as External Data Controllers (e.g. credit recovery and contractual advice).
- IT companies, appointed for this purpose as external Data Controllers, insofar as they have access to the information systems within the conduct of their maintenance activities.

The personal data collected will not be transferred to extra-Eu countries

Rights of Data Subjects

The GDPR grants a series of rights (articles from 15 to 22) to protect the interested parties which will always hold:

- the right to access information concerning them and to be informed about the methods and purposes of the processing which such information undergoes;
- the right to rectification, i.e., to amend data, if incorrect or not updated;



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- the right to erasure, object to processing or even obtain the limitation thereof, in case the conditions laid down by law for this purpose occur;
- the right to obtain the portability of the personal data provided, if processed by automated means.

Data Subjects can exercise their rights by writing to amministrazione@piovanelli.com.

Data Subjects have the right to lodge a complaint with the Supervisory or bring a lawsuit for the protection of their rights.

I hereby declare that i have read the privacy information notice. I furthermore state that 1) I am aware Armeria Piovanelli S.r.l. will process personal data for the sole purpose of facilitating the establishment of the supply relationship and fulfilling the contract entered into and 2) I am aware of the capability to exercise the rights referred to in articles 15-22 of Regulation (EU) 2016/679.

Signature
