

INFORMATION FOR CUSTOMERS AND SUPPLIERS ON THE PROCESSING OF PERSONAL DATA

The **Controller of personal data**¹ (pursuant to the legislation on personal data protection²) Gruppo DP S.p.A. (VAT IT03436170108) with headquarters in Genoa (Italy), Via Trento 43/3, PEC HR.GRUPPODP@REGISTERPEC.IT provides, also to ensure fair and transparent treatment, the following information:

CATEGORIES OF PERSONAL DATA AND PROCESSING METHODS

The data processed are personal³, common and identifying⁴ data provided by you⁵, and related to you and/or your representatives and referents collected from you or other subjects, or otherwise processed in the course of relations with the Controller. The processing will take place in paper format and using computer tools with security and confidentiality profiles suitable to guarantee the security and confidentiality as well as to prevent unauthorized access to personal data.

PURPOSE OF THE PROCESSING

The processing is carried out for the following purposes:

1. in the fulfillment of specific obligations or tasks provided for by EU legislation, laws, regulations, as well as for organizational, administrative, accounting, insurance, tax, legal, secretarial, correspondence necessities;
2. pre-contractual/contractual obligations arising from the cooperation/supply contract relationships entered into/between and for the purposes provided for in the general conditions of sale/purchase;
3. quality and reliability control;
4. recovery of claims;
5. protection of rights⁶.

LEGAL BASIS OF PROCESSING

The processing of personal data for the purposes indicated in points 1 and 2 of the previous paragraph is necessary for the execution of the contract to which you are a party or for the execution of pre-contractual measures taken at your request and is also necessary to fulfill obligations legal/regulatory to which the Data Controller is subject (art. 6 (1) letter b) and c) of the GDPR).

The processing of data for the purposes referred to in points 3, 4 and 5 of the previous paragraph is necessary for the pursuit of the legitimate interest of the Controller (art. 6 (1) lit. f) GDPR).

POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE DATA

For the personal data indicated above limited to those whose communication to the Controller results from a legal/regulatory or contractual obligation or is necessary for the conclusion of a contract the failure of the data subject to communicate the information will result in the following consequences: impossibility to establish/continue and manage the relationship or to comply with legal obligations.

For the processing of data based on legitimate interest, the Controller has made a balance of necessity and proportionality of the same with your rights. This processing is carried out until the right of opposition is exercised in accordance with the procedures described in the following paragraph "Rights".

RECIPIENTS

Recipients/categories of recipients of personal data are:

- Natural persons authorized by the Controller to process personal data after signing a confidentiality agreement;
- Financial administration;
- Public Administrations;
- Lawyers and consultants;
- Auditor of accounts;
- Customers/Suppliers;
- Insurance and credit institutions and related companies;
- Consultants and debt collection companies.
- Companies managing documents digital preservation (Digital preservation is a standardized process that can ensure authenticity, integrity, reliability, legibility and availability to an IT document. The historical memory of the information is preserved and it is not "simply" archived, but its full legal validity and constant usability over time is ensured);

¹ Hereinafter referred to as "Holder".

² See EU Regulation 679/2016 (hereinafter GDPR), D. Lgs. 101/2018 and D. Lgs. 196/20013 and ss.mm.ii. See also European Data Protection Regulation 679/2016 (hereinafter GDPR).

³ That is, any information concerning an identified or identifiable natural person («interested»); is considered to be identifiable the natural person who can be identified, directly or indirectly, with particular reference to an identifier such as name, identification number, location data, an online identifier or one or more elements characteristic of its physical, physiological, genetic, psychological, economic, cultural or social identity.

⁴ Or by third parties.

⁵ This includes Vs. employees or collaborators, whose data are processed in the performance of supply services/ pre-contractual and/ or contractual and to which you undertake on behalf of the Controller to provide the information referred to herein and collect any necessary consents.

⁶ Such as for example recovery of claims, whether customers, disputes concerning the goods, suppliers, etc.

- Companies providing IT services, providers of digital signature credentials (e.g. Certification Authority, Qualified Trust Service (QTSP) providers etc.), service providers digital transaction management of approval and document signing. These entities normally operate as independent controllers of the data⁷, unless they have been designated processors. The names of the Data Processors can be requested from the Data Controller by writing to hr.gruppodp@registerpec.it

TRANSFER

The Data Controller does not transfer personal data to recipients outside the EEA.

CONSERVATION

For personal data whose communication to the Controller results from a legal/regulatory or contractual obligation or is necessary for the conclusion of a contract or continuation of the relationship, the possible failure of your communication entails as a consequence the impossibility to establish and/ or manage/ continue the contractual relationship and/ or collaboration/ supply/ sale/ contract.

For the processing of data based on legitimate interest, the Controller has made a balance of necessity and proportionality with your rights. This processing is carried out until the right of opposition is exercised in accordance with the procedures described in the following paragraph "Rights".

RIGHTS

The data subject has the right - in the cases provided by law: to request, with reference to personal data, access, rectification; the cancellation of the event; the portability of information; the limitation of processing; to object to the processing; not be subject to a decision based solely on automated processing, including profiling, which produces legal effects affecting him or which similarly significantly affects his person.

To exercise these rights, the data subject may contact the Controller at the addresses indicated above.

RIGHT TO COMPLAIN

The data subject has the right to lodge a complaint with the Data Protection Authority.

AUTOMATED DECISION-MAKING, INCLUDING PROFILING

No automated decision-making processes and/or profiling are carried out⁸.

DIFFERENT ENDS

If the Data Controller intends to further process the data for a purpose different from that for which they were collected, it will provide the data subject with information about this different purpose and any other relevant information before such further processing.

Please return a copy of this duly signed, we send you our best regards.

The Data Controller
Gruppo DP S.p.A.
Nicola Dagnino – President of the BOD

We declare that we have received the above information and also that we have returned on behalf of the Data Controller the above information to any other interested parties to whom the data provided refer.

Received, read and understood the information ex art. 13 and 14 EU Regulation 679/2016.

Signature

⁷ Except as specified below.

⁸ As referred to in Article 22 of the GDPR.