

INFORMATION REGARDING PROCESSING OF PERSONAL DATA

(art. 13 Regulation (EU) 2016/679 and Italian Legislative Decree 196/03 as amended and integrated from time to time)

Data controller

The data controller is the Company Gefran S.p.A. ("Gefran" or the "Company"), headquartered in Provaglio d'iseo (BS) via Sebina 74, 25050, pec gefran@legalmail.it.

Types of personal data

The data provided by You and concerning the personnel assigned to the performance and management of the agreements with the Company, including name, surname, contact data, e-mail address, positions where relevant; data related to the payroll and any social, pension and/or insurance contribution duly payments with reference to Your personnel who is assigned to the performance of services in the Company's premises (if such data are necessary for verifying the compliance with laws aimed at safeguarding personnel used for the performance if the activities under the agreements); data concerning Your legal representatives, including their judicial data, if required by the law (hereinafter the "Data Subjects") - either where such data have been provided by You directly or if obtained by public sources (for example by the Chambers of Commerce) - will be processed by the Company in accordance with Regulation (EU) 2016/679 and with local laws, including any possible decisions issued by the Supervisory Authority, as applicable, and, according to accuracy, lawfulness and transparency principles, preserving their confidentiality and their related rights. In case of suppliers who are natural persons, in addition to the data described above, the Company may process also data related to invoicing and payments (included tax code and VAT number), bank data, registration in specific bars or registers, economic and financial data (such as the financial report).

Processing Methods

The personal data of the Data Subjects will be processed by the Company and by its personnel using also electronic automated methods, in addition to the manual ones, if strictly necessary to the purpose of the processing and the data will be processed exclusively within the European Union. Appropriate security measures are observed to prevent the loss of data, illegal or incorrect use and unauthorized access, unless such access is required by the applicable laws or by ensuring restoration of access to data after material or technical accidents).

Personal data of the Data Subjects may be processed using video surveillance instruments placed in the access/exit area and inside the premises, should the Data Subject visit the Company premises, according to the information notice for data processing for video surveillance purposes, available in our premises.

Purposes and legal basis of the processing

The data of the Data Subjects are processed in for: the purpose of selection, entering into, management and performance of the contractual relationships (including scouting activities prior to entering into a contract and/or the registration into the Company's suppliers list), the execution of commercial or professional purposes (such as the management of payments and invoices), to abide by legal obligations (for example, tax and accounting obligations, obligations arising from contract work and health and safety rules at work).

For the abovementioned purposes your consent is not required since the Company is authorized to avail itself of the reliefs available under letter b), c) of article 6.1, of the Regulation (EU) 2016/679 (i.e. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; and processing is necessary for

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IT03032420170
n. iscrizione Registro
AEE: IT1808000010658

compliance with a legal obligation to which the controller is subject). In case of individual suppliers, as regards the processing of economic and financial data, such as commercial information and financial report, the Company is authorized to avail itself of the relief available under letter f) of article 6.1, of the Regulation (EU) 2016/679 (legitimate interests of the Company to verify the economic and financial solidity of its business partners).

Storage of data

The data will be maintained for the time strictly necessary in order to provide the requested services, without prejudice to the obligations provided for by the law.

Any withdrawal of the consent to the treatment does not affect the lawfulness of the processing based on the consent given before the withdrawing.

Dissemination, disclosure and transfer of data

Personal data shall not be disseminated.

Without prejudice to the duty of disclosure in order to fulfil any legal or contractual obligations, the data may be disclosed to tax or legal consultants, to Company's collaborators, to the banks, to public entities as well as to those persons that are authorized by the laws to receive such data, if required, to Italian or foreign judicial or other public authorities for the fulfilment of legal obligations, or for the performance of the obligations arising from an agreement, including for the purposes of defence before the Courts. Such entities act as independent data controllers. Contact details may also be disclosed occasionally and for single reasons, to other customers and/or suppliers of the Company, including - without limitation - if it becomes necessary to collaborate with any of such persons for the performance of the contractual obligation. In order to perform certain services implying the need of personal data processing, the Company may also avail of third parties, including in respect of the service of substitutive filing. These companies shall operate as external data processors in compliance with specific and adequate directions concerning the processing methods and safety measures as specified in specific contractual documents.

The data may be disclosed to other companies belonging to the Group, including subsidiaries and affiliates, with registered office inside and outside the European Union (the updated list is available on Gefran website), if necessary for internal administration purposes and the coordination of the group, or if such companies need to cooperate for the performance of the contract. In this case, with reference to transfer the data to countries located outside the European Union, the Company undertakes to ensure a level of protection and preservation.

Rights of the data subjects

The Data Subjects have the rights provided by the Regulation (EU) 2016/679, including among the others:

- obtain confirmation of the existence of such data and to know its content and origin, to verify its accuracy or to request its integration or updating, or correction;
- request cancellation, anonymization, to block data processing in violation of the law, as well as the right to data portability; and to oppose, in any case, for legitimate reasons to the processing;
- withdraw previously given consent, if any, without prejudice to the lawfulness of processing based on that consent.

In order to exercise the rights referred to in this statement it is possible to contact the Company at the address indicated above or email us at privacy@gefran.com

The Data Subjects are entitled to submit complaints to the Italian authority for the protection of personal data, www.garanteprivacy.it.

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