

Data protection information letter in accordance with EU Regulation 679/2016 (General Data Protection Regulation) – Clients and supplier

Dear client,

Dear supplier

Herewith we would like to inform you in terms of Art. 13 of the GDPR about how your personal data is processed. From this information letter you can also see what rights you can exercise.

Who processes my personal data?

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What personal data is processed and for what purpose?

Pursuant to the EU Regulation 2016/679 (General Data Protection Regulation) and applicable national data protection legislation, the following data, among others, may be subject to processing:

- ✓ Operational data (e.g., data on the company, data on projects, contact details, VAT Number, Anagraphic data of employees, billing data)

The **purpose** of the data processing is the fulfillment of the business relationship and the related pre-contractual/contractual measures.

Any failure to provide the data will prevent us from offering you our service(s).

To whom will my personal data be forwarded?

Your data will not be disseminated and will be processed confidentially exclusively for the fulfillment of the pre-contractual/contractual measures. However, in order to offer our service(s) and within the framework of the business relationship, it may be necessary that the personal data are disclosed to third parties, for the fulfillment of the business relationship, e.g., to:

- ✓ External IT service providers
- ✓ Public authorities and legal representatives
- ✓ Sub-contractors
- ✓ Forwarding companies (possibly)

External suppliers, such as the external IT service provider, may also have access to personal data under certain circumstances. Data processors have been appointed in writing as processors in accordance with Art. 28 of the GDPR.



What are the legal bases for data processing?

Legal bases used with examples:

- ✓ Pre-contractual/contractual measures (Art. 6.1 b GDPR) e.g., for the fulfillment of inquiries and the business relationship.
- ✓ Fulfillment of legal obligations (Art. 6.1 c GDPR) e.g., transfer of data to our tax advisor
- ✓ Legitimate interests (Art. 6.1 f GDPR) e.g., processing of data in the internal system, sending relevant information letters

For how long will my personal data be stored?

The duration for the storage of your personal data is determined by the legal obligations and the duration of our business relationship. Fiscally relevant data is retained for 10 years.

Does data transfer outside the EU or profiling take place?

Your data will not be transferred to non-EU countries. Automated decision-making including profiling is not used.

What are my rights?

You can exercise your rights free of charge at any time: right to access (Art. 15 GDPR), right to rectification (Art. 16 GDPR), right to erasure (Art. 17 GDPR), right to restriction of processing (Art. 18 GDPR), right to data portability (Art. 20 GDPR), right to object (Art. 21 GDPR).

Please contact the above data controller.

You also have the right to lodge a complaint with the Italian supervisory authority for data protection "Garante per la protezione dei dati personali".

