

INFORMATION FOR THE PROCESSING OF SUPPLIERS' PERSONAL DATA

PURSUANT TO ART. 13 OF EU REGULATION 2016/679 (GDPR)

BARAZZONI S.P.A., with registered office in Via Cesare Battisti, 46, 28045, Inverio, NO, P.IVA 00540880036, Fiscal code 00540880036, in the person of its legal representative pro tempore, hereinafter also only "Barazzoni" or "the Data Controller", in its capacity as Data Controller pursuant to EU Regulation 679/2016 - General Data Protection Regulation (GDPR), hereinafter also only "GDPR", recognises the importance of the protection of personal data and considers their protection one of the main objectives of its activity.

We hereby provide due information regarding the processing of personal data to suppliers who are natural persons/individual companies and to natural persons acting on behalf of suppliers who are legal persons, pursuant to Article 13, GDPR. Therefore, before supplying any personal data, Barazzoni invites you to read this information notice carefully as it contains important information on the protection of personal data and the security measures adopted to guarantee their confidentiality in full compliance with the regulations in force.

Barazzoni informs you that your personal data will be processed using manual, IT and/or telematic tools and will be based on the principles of lawfulness, correctness, transparency, limitation of purposes and storage, data minimisation, accuracy, integrity and confidentiality and protection of the rights and freedoms of the person concerned.

Personal data will therefore be processed with logic strictly related to the purposes indicated below, in accordance with the provisions of the GDPR and, in any case, in such a way as to guarantee the security and confidentiality of the data.

Foreword

"GDPR" means EU Regulation 679/2016 of the European Parliament and of the Council of 27/04/2016, applicable from 25/05/2018, on the protection of natural persons with regard to the processing of personal data.

"Personal data" means any information relating to an identified or identifiable natural person ("data subject"), with particular reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more characteristic elements of that person's physical, physiological, mental, economic, cultural or social identity.

'Particular data' means personal data revealing racial or ethnic origin, religious or philosophical beliefs, or trade union membership, as well as genetic and biometric data, data concerning a person's health or sex life or sexual orientation.

Judicial data' shall mean personal data relating to criminal convictions and offences or related security measures.

Processing' shall mean any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

1. Purpose of the Processing

The Data Controller processes personal and identification data voluntarily provided by the data subject (verbally, by means of business cards, requests for information, e-mail, delivery of documents, through the Data Controller's website, etc.), by way of example but not limited to: name, surname, place and date of birth, address of residence and domicile, place of work, registered office, company name, VAT number, tax code, landline and/or mobile telephone number, fax number, e-mail address, PEC address, employer's company, role and/or company classification, bank details, etc.

2. Purpose and legal basis of processing, nature of provision and refusal

Personal data will be processed for the following purposes

- (a) to fulfil pre-contractual and contractual obligations arising from existing relations with you;
- b) to manage the administrative, commercial and logistical management of the supply relationship (e.g. bookkeeping, invoicing, payments) that may ensue;
- c) management of administrative, accounting, civil, fiscal fulfilment of obligations provided for by law (such as, for example, those of an accounting and fiscal nature), by a regulation, by Community legislation or by an order of the Authority to which the Controller is subject
- d) archiving;
- e) purposes necessary to ascertain, exercise or defend a right of the Data Controller in judicial and/or extrajudicial proceedings or whenever the Judicial Authorities exercise their jurisdictional functions.

For the purposes indicated in points a) and b) of this paragraph 2, the legal basis of the processing, which attests to its lawfulness, is that provided for in Article 6(1)(b) of the GDPR, i.e. "the processing is necessary for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the data subject's request".

The processing carried out for the purposes in points c) and d) of the same paragraph is based on legal obligations to which the Data Controller is subject (Art. 6(1)(c) of the GDPR).

For the purposes stated in point e), the processing is necessary for the pursuit of the legitimate interest of the Controller to protect its rights arising from the contract (Art. 6(1)(f) of the GDPR).

Please note that for the purposes of the processing as outlined above in points a), b) and c) and d), the provision of data is mandatory. Any failure to provide, partial or inaccurate provision of data and/or any express refusal to process it will make it impossible for the Data Controller to enter into contractual relationships or fulfil contractual obligations undertaken or a legal obligation to which the Data Controller is subject or requests by the competent Authorities.

The data subject may object to the processing at any time by exercising the rights provided for by the GDPR in the forms and ways indicated below in this information notice.

3. Place and methods of processing, storage times

Data processing takes place at the aforementioned premises of the Data Controller and at identified third parties.

Data are collected and processed by the Controller in compliance with the principles of lawfulness, correctness and transparency and in such a way as to guarantee adequate security, including protection, by means of appropriate technical and organisational measures, from unauthorised or unlawful processing and from accidental loss, destruction or damage.

The data collected will be processed by means of electronic or in any case automated, computerised and telematic instruments, or by means of paper-based instruments, with logic strictly related to the purposes for which the personal data were collected and, in any case, in such a way as to guarantee the security of the same and for the time strictly necessary for the performance of the contractual relationship, as well as for that prescribed by civil, tax and regulatory provisions and, in any case, for no longer than 10 years from the end of the contractual relationship or even beyond that period, until the limitation period provided for by law with reference to the individual rights that can be enforced by the Data Controller.

Once these terms have expired, your data will be anonymised or deleted, unless it is necessary to keep it for other and different purposes provided for by express legal provision.

Further information on the data retention period and the criteria used to determine this period may be requested by writing to the Data Controller.

4. Categories of recipients of personal data

Your personal data collected and processed may be shared, exclusively for the purposes specified above, with the following categories of recipients

a) persons authorised by Barazzoni to process personal data, who have committed themselves to confidentiality or have an adequate legal obligation of confidentiality (e.g. employees and collaborators of Barazzoni);

b) persons, companies, consultants or other third parties, such as, by way of example, professional firms, tax, legal, IT and labour consultants, companies that maintain the IT equipment and the services of the Barazzoni website, banking institutions, insurance companies, professionals carrying out auditing and certification of financial statements, etc, each for their specific field of competence, with whom Barazzoni has relations necessary to carry out their activities or by law, to whom a specific mandate has been entrusted and for the time necessary to achieve the purposes for which the data were collected, who act, where necessary, as data processors of Barazzoni;

c) Judicial or supervisory authorities, administrations, public bodies and organisations, in the exercise of their functions, when required by law.

All subjects belonging to the categories to which the data may be communicated will use them in their capacity as persons authorised to process personal data under the direct authority of the Data Controller, or as "Data Processors" specifically appointed and instructed by Barazzoni in its capacity as Data Controller, or as autonomous "Data Controllers", authorised to access the data by virtue of provisions of law, regulations and rules or for the execution of a contract.

In any case, your data will not be disseminated.

5. Transfer of data outside the EU

The processed data are stored on servers located at the Data Controller's premises within the European Union. In any case, it is understood that the Data Controller may also move the servers outside the EU if necessary. In this case, the Data Controller guarantees as of now that the transfer of data to non-EU countries will take place in compliance with the applicable legal provisions, subject to the stipulation of standard contractual clauses as provided for by the European Commission.

6. Automated decision-making process

For the pursuit of the processing purposes described above, no decision is made solely on the basis of automated processing that produces legal effects concerning you or similarly significantly affects you.

7. Rights of the data subject

In accordance with the GDPR, we inform you that, as a data subject, you may exercise the following rights:

- (i) right of access: to obtain confirmation as to whether or not personal data relating to you are being processed and, if so, to receive information relating, in particular, to: the purposes of the processing, the categories of personal data processed and the period of storage, the recipients to whom the data may be disclosed (Article 15, GDPR);
- j) right to rectification: to obtain, without undue delay, the rectification of inaccurate personal data concerning you and the integration of incomplete personal data (Article 16, GDPR)
- k) right to erasure: to obtain, without undue delay, the erasure of personal data concerning you, in the cases provided for by the GDPR (Article 17, GDPR);
- l) right to restriction: to obtain from the Controller the restriction of processing, in the cases provided for by the GDPR (Article 18, GDPR);
- m) right to portability: to receive, in a structured, commonly used and machine-readable format, the personal data concerning you provided to the Controller, as well as to obtain that they be transmitted to another controller without hindrance, in the cases provided for by the GDPR (Article 20, GDPR)
- n) right to object: to object to the processing of personal data concerning you, unless there are legitimate grounds for the Controller to continue the processing (Article 21, GDPR);
- o) if the processing is based on consent, pursuant to Article 7, GDPR, the right to withdraw the consent given at any time without affecting the lawfulness of the processing based on the consent given before the revocation;
- p) the right to lodge a complaint with the supervisory authority - lodge a complaint with the Supervisory Authority for the Protection of Personal Data, based in Piazza di Montecitorio no. 121 - 00186 Rome (RM).

8. Procedures for exercising rights

You may exercise your rights at any time by sending

- a registered letter to: Barazzoni S.p.A., with registered office in Via Cesare Battisti, 46, 28045, Invorio, NO
- an e-mail to the address: privacy@barazzoni.it

9. Data controller, data processors, persons authorised to process data

Pursuant to the GDPR, the Data Controller is: Barazzoni S.p.A., with registered office in Via Cesare Battisti, 46, 28045, Inverigo, NO, as defined above.

The updated list of Data Processors and persons authorised to process data is kept at the registered office of the Data Controller.

For any information regarding the processing of personal data carried out by the Data Controller, please write to the following e-mail address: privacy@barazzoni.it

10. Changes

This policy is in force as of 25/05/2018. The Data Controller reserves the right to modify or simply update its content, in part or in full, also due to changes in current legislation.