

## **NPE srl**

Protection of personal data: Privacy Notice for Customers and Suppliers (to natural persons acting in the capacity or on behalf of Customers or Suppliers)

The information contained in this document is provided to comply with the transparency obligations set out in EU Regulation n.679 of 27.4.2016 on the protection of personal data.

The EU Regulation 2016/679 requires to provide, to the persons whose data are collected, information related to the processing of the same data, in a concise form and with simple and clear language. Articles 12, 13 and 14 of the Regulation specify the content of the information to be communicated. This document therefore serves to inform you of your intentions. In this document, you are also identified as "concerned". Please bring this document to the attention of all natural persons who will act on your behalf in relations with our company and who therefore may give us their personal data and contact.

## The data controller is NPE srl.

The controller is the one who determines the purposes and means of processing personal data. In the contractual or pre-contractual relationship with this company, the Data Controller is:

NPE srl, with headquarters and contact point:

Loc. Villanova - Zona Industriale 6 - 32013 Longarone (BL).

## The processing of personal data is mandatory and necessary for the management of the contractual or pre-contractual relationship

The purpose for which the data are collected is related to the management of contracts for works or services, for pre-contractual activities, for tax obligations and any other obligation provided by law, regulation, Community legislation or an order of the Authority (such as anti-money laundering) and to exercise the Holder's rights, for example the right of defense in court.

The legal basis for processing data is included in the legislation governing the conduct of economic activities. The personal data of natural persons who act in the name and on behalf of the Customers or Suppliers, when collected, are processed by the Data Controller to send communications of various kinds and with different means of communication (telephone, mobile phone, SMS, email, paper mail, other); to formulate requests or process requests received; to exchange information aimed at the execution of the contractual relationship, including pre- and post-contractual activities; to carry out the operations necessary for the processing of purchasing orders and other requests.

The data will be used in electronic, telematic and paper form. The processing operations are carried out in such a way as to guarantee the logical, physical security and confidentiality of your personal data.

The data of Customers and Suppliers must be compulsorily given, under penalty of impossibility to conclude and then manage the contract.

The data processed do not include particular categories of data but only common and contact data and, in relation to Customers and Suppliers, tax and bank data.

The data will also be communicated to external entities, companies and persons.



Your data will be consulted and used, in accordance with the internal guidelines and procedures, by workers nominated by this company, including employees (including external), to carry out their assigned tasks. The data of Customers and Suppliers will also be communicated to third-party companies or other entities (for information purposes, credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, etc.) who carry out activities to provide services on behalf of the Data Controller, in their capacity as external data processors.

There will also be appropriate communication to those identified by law or other binding legal act. These entities will process the data in their capacity as independent controllers.

The updated list of public and private entities that may become aware of your data can be requested at the registered office of the Data Controller. The Company does not intend to transfer your data abroad. If it is deemed necessary or appropriate in the future, the transfer will only take place in the presence of an adequacy decision of the European Commission or, in the case of transfers referred to in article 46 (Transfer subject to adequate guarantees) or 47 (Binding corporate rules), or Article 49 (Derogations in specific situations), second paragraph, only where there is an express reference to appropriate or appropriate safeguards and means of obtaining a copy of such data or the place where they have been made available.

## We will keep your data in the Company for at least 10 years after the termination of the economic relationship.

For the conservation obligations required by tax legislation, your data will be kept for 10 years after the last financial report year. After this period and before their destruction, the data shall be evaluated to be retained for further storage. The data may also be retained for your protection or for the protection of this Company in the event of legal action, until the end of the period within which the legal action can be exercised or until the end of the judicial proceedings, in case of ongoing litigation.

The Regulation grants you the rights set out in articles 15, 16, 17, 18, 19, 20, 21, 22 and 34, which are summarised below, and the right to bring a complaint to the Guarantor.



The Regulation specifies the rights of the interested party which are summarised below.

Art. 15 - Right of access

The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the information

Art. 16 - Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Art. 17 - Diritto alla cancellazione (diritto all'oblio)

L'interessato ha il diritto di ottenere dal titolare del trattamento la cancellazione dei dati personali che lo riguardano senza ingiustificato ritardo e il titolare del trattamento ha l'obbligo di cancellare senza ingiustificato ritardo i dati personali se sussistono i motivi elencati nello stesso articolo.

Art. 18 - Right to erasure ('right to be forgotten')

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the grounds in the same Article applies ((for example when the accuracy of the data is contested or when the data is necessary for the exercise or defense of a right in court).

Art. 19 - Notification obligation regarding rectification or erasure of personal data or restriction of processing

The controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with Article 16, Article 17 and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The controller shall inform the data subject about those recipients if the data subject requests it.

Art. 20 - Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided,

In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

Art. 21 - Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(tasks of public interest and pursuit of legitimate interest)), including profiling based on those provisions. 2

Art. 22 - Automated individual decision-making, including profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

Art. 34 - Communication of a personal data breach to the data subject

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay.

To exercise your rights, please send a registered letter to the Data Controller, at the contact point address above.

In the event that you believe that your rights summarized above have not been recognized or in the event of unjustified delay, you have the possibility of filing a complaint with the Guarantor for the Protection of Personal Data. On the Guarantor's website you will find the form for the complaint (<a href="www.garanteprivacy.it">www.garanteprivacy.it</a>). You can also take legal action (art. 79 of the Regulation).