

**POLICY ACCORDING TO AND BY THE EFFECTS OF ART. 13 OF THE EU REGULATION  
N. 2016/679 (GDPR), REGARDING THE PROTECTION IN PERSONAL DATA PROCESSING**

**Dear Supplier,**

The Data Controller **C.P.S. ANALITICA S.R.L.**, VAT number 02750990034, with registered office in Via Crosa, 67 - 28065 Cerano (NO) - in the person of its legal representative - provides the supplier with the following information, according to and by the effects of art. 13 of EU Regulation no. 2016/679, later also referred to as **GDPR**.

**1. Source and type of processed personal data and related purposes**

We wish to inform you that the personal data subject to processing that we hold in our possession, and more precisely, the common personal data, directly referring to the supplier and/or to other interested parties (such as employees, contact persons, etc.) disclosed by latter in accordance with the execution and carrying out of the relations with the Data Controller, were provided in order to obtain an offer by the company or to fulfill contractual or legal requirements. These data will be processed according with the principles of confidentiality, fairness, legality, and transparency, as established by EU Regulation no. 2016/679, for the following purposes:

- 1) Fulfillment of the obligations related to the management of the commercial relationships established by the contract, by laws, by regulations and by European legislation;
- 2) Implementation of contractual measures taken on request of the data subject and related commitments;
- 3) Protection of contractual rights.

**2. Processing Methods**

Your personal data will be entered in the Data Controller's database and will be processed with suitable tools to guarantee security and confidentiality. The processing may be carried out using both manual and electronic instruments that are appropriate for storing, maintaining, and transferring data. The processing will strictly be related to the purposes of the treatment, and in any case to guarantee the security and confidentiality. By processing personal data, the Company undertakes to:

- a) ensure the accuracy and updating of the data processed, and promptly implement any change and/or additions requested by data subject;
- b) notify the data subject of any violations of personal data within the times and in the cases by the mandatory legislation;
- c) guarantee the compliance of the processing operations with the applicable legal provisions.

The acquired personal data are processed in full compliance with the principles of confidentiality, fairness, legality, and transparency. According to the Privacy Law, the Company is committed in any case to configure information systems and computer programs to minimize the use of personal data, and to exclude their processing if the purposes pursued can be achieved through, respectively, anonymous data or appropriate methods which only permit the data subject to be identified when necessary.

**3. Nature of personal data**

Your personal data that are object to such processing and used for the purposes listed in point 1, are the subject of processing. The personal data collected essentially relates to:

- personal data of natural persons;
- economic and commercial data activity (orders, bank and financial data, accounting, and financial data, etc.).

**4. Mandatory or optional nature of the provision of data and consequences of a refusal to respond**

Regarding the purposes listed in the first paragraph, prior expressed consent is not necessary since the nature of the provision of data on your behalf is optional. In case of refusal, the Data Controller will not be able to follow up on the requests indicated above.

## 5. Communication and dissemination of data to third parties

Your personal data will be processed by the latter, by any Data Processors appointed by the Data Controller and by any strictly authorized Data Processors. Your personal data may be communicated following inspections or checks (if required), to all the supervision authorities responsible for checking the regularity of legal obligations.

Your data may also be communicated to external professional companies and societies that provide assistance and work and commercial consultancy or to collaborators of the Data Controller, in accounting, administrative, fiscal, tax and financial matters, to public administrations for carrying out of institutional functions within the limits established by law or regulations, to companies operating in the transport sector.

Your personal data is not subject to automated dissemination. The scope of data communications will be exclusively within the EU and exclusively for the purposes specified above.

## 6. Data transfers abroad or International Organizations

According to the European Data Protection Regulation, interested parties must be notified if their data is transferred to a third country (not belonging to the EU or the European Economic Area: Norway, Iceland, Liechtenstein) or international organizations.

The Company, as Data Controller, informs the interested parties of the fact that personal data will not be transferred abroad to non-EU countries or to countries considered non-safe by the EU Guarantors.

## 7. Storage period

The Company keeps the personal data acquired in its systems in a form that allows the identification of the interested parties for a period not exceeding the achievement of the purposes for which they are processed, or to comply with specific regulatory or contractual obligations.

In particular, some data may be kept for a certain period, in order to fulfill contractual or legal obligations, such as:

### A) Administrative-accounting activities in general. This means the treatment connected to the performance of activities of an organizational, administrative, financial and accounting nature, regardless of the nature of the data processed.

Legal basis: Legitimate interest - Supplier data management  
Detention period: 10 years – Art 2220 C. C.

### B) Any contact or information request:

Legal basis: Legitimate interest - Request from the data subject  
Detention period: 1 year

## 8. Security

The appropriate security measures were adopted by the Data Controller in order to protect your data against the risk of loss, misuse or alteration.

## 9. Rights of the interested party (artt. 15-21 GDPR)

In the end, we inform you that the articles 15 - 21 of the Regulation grant the data subject the exercise of specific rights, in particular:

- Art. 15 - Right of access: The data subject has the right to obtain confirmation from the Data Controller as to whether personal data concerning him or her is being processed and, where that is the case, to obtain access to personal data and information regarding the processing.
- Art. 16 – Right of rectification: The data subject has the right to obtain from the data controller the rectification of inaccurate personal data concerning him or her without undue delay. Considering the purposes of the processing, the interested party has the right to obtain the integration of incomplete personal data, also by providing a supplementary declaration.
- Art. 17 – Right to erasure ("right to be forgotten"): The data subject has the right to obtain from the data controller the erasure of personal data concerning him or her without undue delay and the data controller has the obligation to erase the personal data without undue delay where one of the grounds

mentioned in Article 17 of the Regulation applies.

- Art. 18 - Right restriction of processing: The interested party has the right to obtain from the data controller the restriction of processing when one of the grounds referred to in art. 18 applies.
- 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 (paragraph 1) and Article 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves a disproportionate effort. The data controller communicates these recipients to the interested party if the interested party requests it.
- Art. 20 - Right to data portability: The interested party has 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 has the right to transmit those data to another data controller without hindrance from the data controller to which data have been provided.
- In exercising his or her rights in relation to data portability pursuant to paragraph 1, the interested party has the right to have the personal data transmitted directly from one data controller to another, where technically feasible.
- Art. 21 - Right to object: The interested party has the right to object at any time, on grounds relating to his or her situation, to processing of personal data concerning him or her pursuant to article 6, paragraph 1, letters e) or f), including profiling based on those provisions.

The European Regulation also recognizes the interested party's right to lodge a complaint with the supervisory authority, the right to withdraw consent at any time and the right to data portability.

To exercise your rights or if you wish to have further information on the processing of your personal data, the interested party may directly contact our Company with operational headquarters in Via Neera, 8/A – 20141 Milan (MI) by registered letter A/ R or by sending a PEC to [cpsanalitica@legalmail.it](mailto:cpsanalitica@legalmail.it).

#### **10. Data Controller, data processors and appointees**

The Data Controller is **C.P.S. ANALITICA S.R.L.**

The updated list of Data Processors and appointees is kept at the Data Controller's operational headquarters.

#### **11. Changes**

This INFORMATION NOTICE is always available at the Company's operational headquarters in Via Neera, 8/A – 20141 Milan (MI).

The owner reserves the right to modify or simply update its content, in part or completely, also due to changes in the applicable legislation. If the amendments to this information concern substantial changes in the treatments or may in any case have a significant impact on the interested parties, the owner will take care to appropriately notify the interested parties.