



PRIVACY POLICY FOR SUPPLIERS, CONSULTANTS AND INDEPENDENT COLLABORATORS

pursuant to art. 13 of Reg. (EU) 2016/679 (hereafter, "GDPR")

*EURODIES ITALIA SRL ensures protection and confidentiality
for the processing of personal data provided by Suppliers, Consultants
and Independent Collaborators who work with the Company*

Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and the Council



When signing a work contract, it is important for us to inform you how we collect and use personal data. We would like to assure you that processing of personal data is subject of great attention by EURODIES ITALIA SRL, which we will also be called the "Company" hereafter.

The collection of personal data is carried out in compliance with:

- the European Regulation 679/16 ("GDPR")
- the Legislative Decree no. 196/2003 (i.e. the so-called "Privacy Code" - as amended by Legislative Decree no. 101/2018)
- the dictates of the Provisions of the Guarantor
- the legal provisions in force in the territory in which the Company operates

EURODIES ITALIA SRL is committed to protect the privacy and rights of the data subject and, according to the principles of the regulations, the processing of the data provided will be based on the **principles of fairness, lawfulness and transparency**

To whom this policy is addressed

This policy is for all Suppliers, Consultants and Independent Collaborators who work with EURODIES ITALIA SRL

Who is the Controller and which category data are processed



The controller of your personal data is EURODIES ITALIA SRL, EURODIES ITALIA SRL, CF/P.IVA 00578730012, con sede legale in Avigliana (TO), in Viale dei Mareschi, 25, Tel +39 011 9572962, mail privacy@eurodiesitalia.com.



The processing will only concern the data subject's common information (such as name, surname, address, telephone, e-mail, fiscal code, bank account details) which do not disclose "special category personal data" (i.e. those that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data or biometric data processed solely to identify a human being, data concerning health or data concerning a person's sex life or sexual orientation) or "judicial data" (such as personal data relating to criminal convictions and offenses, or related security measures).

Purposes and lawfulness of processing



Personal data are processed solely for the purpose of signing contracts with the suppliers, consultants and independent collaborators of the Company and for the purpose of bringing into effect the collaborations.

In the pre-signing stage, the processing of personal data of the data subject may also have pre-contractual purposes. In any case, personal data are processed to allow the Data Controller to fulfill the obligations established by law, by a regulation or by the EU legislation and for civil, accounting and tax purposes. Furthermore, personal data may be processed in any judicial, administrative and arbitration offices for the protection of the rights of the Data Controller.

EURODIES ITALIA SRL informs that with regard to the processing above, the Data Controller is not obliged to acquire the data subject's consent, as pursuant to article 6 of Reg. (EU) 679/2916, since the provision of personal data is necessary to enter into a service and/or consultancy and/or supply Agreement, and is necessary to fulfil the Data Controller's legal obligations and to meet the data subject's requirements. In case of judicial, administrative or arbitration actions aiming to assert or defend a right of the Controller, the legal basis of the processing is represented by the legitimate interest of the same.

Data provision

Taking into account the purposes of personal data processing, provision of such data is mandatory in order to perform a contract, which cannot be successful if the data provided are partial, inaccurate or missing.

Dissemination and communication of personal data: Recipients or Categories of recipients

Data will not be communicated. The Controller, within the terms referred to in the previous points, will communicate the personal data:

- to third parties, as independent data controllers or data processors, who support the Data Controller in managing the contractual/pre-contractual stages between the data subject and the Company



- to tax, accounting, administrative and legal consultants
- to banking institutions, for payment purposes
- to public authorities, for legal obligations, such as the payment of the withholding tax
- to the internal staff appointed by the Controller

The list, on request, is available from the Company.

In compliance with the guidelines on transparency under Regulation WP 260/2017, for which the Controller has the duty of justifying the choice of indicating the recipients of the data by means of categories and guaranteeing their specificity, EURODIES ITALIA SRL considers it correct to identify the recipients of the communication by categories, since the list by name would be excessive and incomplete, taking into account the dynamism of the working environment.

Your personal data may be communicated to third party categories such as banks and credit institutions to carry out the necessary payments; to Professionals, Companies or Professional Firms – also Associated Companies - who provide assistance or consultancies to the Data Controller regarding accounting, administration, fiscal, legal and financial matters concerning the contractual/pre-contractual relationship between you and the Data Controller; IT and ICT professionals who need the data to perform their duties relating to the Contract.

Data storage period

In compliance with current legislation and fiscal, civil as well as anti-money laundering requirements, the data collected will be kept for ten years.

Transfer of personal data

The processing will take place mainly in Italy and within the European Union. The data are stored on the Data Controller's servers or at external companies responsible for the processing, which use servers located within the European economic area.

Automated individual decision-making

Automated individual decision-making is not contemplated.

Rights of data subjects

Art. 15-22 of the GDPR set out the data subject's rights, among which:



<i>Right of access</i>	To obtain confirmation as to whether or not personal data concerning are being processed
<i>Right to rectification</i>	To correct or complete personal data
<i>Right to erasure ('right to be forgotten')</i>	To erase personal data under specific circumstances
<i>Right to object</i>	To object to processing of personal data
<i>Right to restriction of processing</i>	To obtain restriction of processing in particular situations
<i>Right to data portability</i>	To receive one's personal data and transfer them to another controller
<i>Right not to be subject to automated processing</i>	The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling
<i>Right to lodge a complaint with a supervisory authority</i>	To appeal in case of data breach

- 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 purposes of the processing; the categories of personal data concerned; the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; and the envisaged period for which the personal data will be stored.
- 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.
- Right to erasure ('right to be forgotten'): As outlined by Art. 17, subsection 3 of the GDPR, the data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her when the personal data are no longer necessary, if consent is withdrawn, if the personal data have been unlawfully processed, or when personal data have to be erased for compliance with a legal obligation.
- Right to object to processing: The data subject shall have the right to object at any time to processing of their personal data which have as legal basis a legitimate interest of the Controller.



- Right to restriction of processing: The data subject shall have the right to obtain from the controller restriction of processing where the accuracy of the personal data is contested by the data subject, the processing is unlawful and/or the data subject has objected to processing.
- Right not to be subject to automated processing: The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, except when the decision is necessary for entering into, or performance of, a contract between the data subject and a data controller or is based on the data subject's explicit consent.
- 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, and have the right to transmit those data to another controller, as set out by Art. 20, subsection 1 of the GDPR (only when the processing is based on consent given by the data subject and only when the processing is carried out by automated means).
- Right to lodge a complaint with the Data Protection Authority, as well as with the jurisdictional Authorities, if it is believed that one of the previous rights have been breached.

All the rights listed above may be exercised at any time by sending a request via email to the address privacy@eurodiesitalia.com

Policy updates

EURODIES ITALIA SRL may update periodically its policies, including this one, in compliance with regulatory changes, legal provisions and the supervisory Authority. The company will publish future updates on the website www.eurodies.com highlighting the new versions with due attention and in a timely manner.

We therefore invite you to periodically consult the company website where, at the "GDPR" button on the home page, you will find updates on the processing of personal data.

Avigliana (TO), 30.05.2022

Eurodies Italia srl