

## PERSONAL DATA PROTECTION POLICY UNDER ARTICLE 13 OF THE G.D.P.R. 679/2016 – CUSTOMERS AND SUPPLIERS

This information is addressed to all our customers and suppliers and generally to natural persons who are operators and natural persons who are representatives of legal persons, whose personal data we acquire, such as personal details and telephone and electronic contact data such as e-mails and social references in contractual/commercial relationships connected to our business.

We inform you that the processing of your personal data takes place in compliance with fundamental rights and freedoms, as well as the dignity of the data subject with particular reference to confidentiality, personal identity, the right and protection of personal data.

Pursuant to Article 13 of EU Regulation 2016/679, we provide you with the following information.

### **PURPOSE OF PROCESSING**

The processing of personal data takes place for the following purposes:

1. to comply with legal obligations, especially administrative, accounting and tax, as well as to allow effective management of professional, financial and commercial relationships (thus including suppliers' assessment questionnaire and customers' post-sale assessment questionnaire);
2. execution of service or supply contracts;
3. to assert or defend a right in court or out-of-court proceedings.

The legal basis of processing is:

- for the purposes referred to in point 1: the legal obligation;
- for the purposes referred to in point 2: the contractual or pre-contractual relationship existing between the parties;
- for the purposes referred to in point 3: the legitimate interest of the data controller.

### **MANDATORY AND OPTIONAL NATURE OF PROVIDING DATA AND THE CONSEQUENCES OF ANY REFUSAL**

The provision of personal data and subsequent processing is optional. However, its provision is required for the purposes referred to in the previous point, any refusal to provide such data or its failure, partial or incorrect provision implies the total or partial impossibility, to improve and execute the purposes declared.

### **PROCESSING METHODS**

The processing of personal data will be carried out both on paper, by manual means, and with the aid of electronic tools through appropriate IT and telematic procedures, through systems and databases owned by our company, suitable for storing, managing and transmitting data, with logic and procedures that guarantee security and confidentiality.

## RETENTION PERIOD

Personal data will be processed for the time strictly necessary to achieve the purposes, described above, to fulfil contractual, law and regulation obligations without prejudice to the statutory and legal periods regarding the rights and in compliance with the consequent obligations. In any case for no more than 10 years + 1 from the termination of the relationship.

## DATA KNOWLEDGE FIELD

Processing of personal data will be carried out by parties expressly and specifically appointed by the data controller, as external or authorized data processors. Data may also be processed by third parties (outsourcers), who are used for the provision of services related to the purpose pursued, which our organization evaluates from time to time, to ensure greater protection.

## COMMUNICATION AND DISSEMINATION

Data may be communicated, with this term intended as giving knowledge to one or more specific parties, other than the data controller, the external data processors and authorized processors identified and appointed to pursue the above purposes and, in any case, within their limits as follows:

- To public and private parties who can access the data by virtue of the provision of law, regulations or Community legislation, within the limits foreseen by these rules;
- To external parties who are advisors of the data controller within the limits required to carry out their duty at our organization, bound by signing specific clauses that impose confidentiality, security and the guarantee of compliance with the current privacy legislation.

Data will not be disseminated, with this term intended as giving knowledge to indeterminate parties in any manner, even through its availability or consultation, short of specific, free and informed consent granted for each type of processing.

## RIGHTS OF THE DATA SUBJECT AND CONTACT DATA

The data subjects to whom the personal data refers, have the right at any time to exercise the rights foreseen by G.D.P.R. 679/2016 shown below:

Article 15 - Right of access, Article 16 - Right to rectification, Article 17 - Right to erasure (right to be forgotten), Article 18 - Right to the restriction of processing, Article 20 - Right to data portability,

Article 21 - Right to object

Article 22 - Right not to be subject to an automated decision-making process, including profiling,

Article 7 - Right to revoke consent, Article 77 - Right to lodge a complaint before a supervisory authority

Regarding exercising their rights, as well as knowing the updated list of those in charge of processing personal data, the data subject may address their requests through specific communication directed to the company, or by mailbox: [info@sapitech.it](mailto:info@sapitech.it), by directly addressing the data controller to get a timely response.

#### **DATA TRANSFER ABROAD**

We inform you that at present the data controller does not transfer your personal data to a third country or to an international organization.

Should you decide to transfer your personal data to a third country or to an international organization, such transfer will only take place if there is an adequacy decision of the European Commission or, in the case of transfers referred to in Articles 46, 47, or 49, second paragraph, only in the presence of express reference to appropriate or opportune guarantees and to the means of obtaining a copy of such data or the place where they were made available.

#### **DATA CONTROLLER**

The controller of personal data is the SAPITECH SRL company, with office in Via della Chimica, 4/G – Alessandria.

Company SAPITECH SRL keeps an updated list of the appointed processors and ensures the data subject reads it at the abovementioned office.

Date of last modification 06.06.2022

**The Data controller**  
**SAPITECH SRL**  
*(original signature)*