

# SUPPLIER PRIVACY POLICY

## PRIVACY POLICY PURSUANT TO ART. 13 OF REGULATION EU 2016/679

### 1. Introduction

For Sammontana S.p.A. your privacy and the security of your personal data are particularly important. This is why we collect and process them with the utmost care and attention, adopting organisational and technical measures.

Sammontana S.p.A. (as defined below) provides to its Suppliers this Privacy Policy in accordance with Regulation EU 2016/679 on Personal Data protection (the "Regulation").

### 2. Data Controller

The Data Controller is Sammontana S.p.A. (hereafter also "Sammontana"), based in Empoli (FI), 50053, Via Tosco Romagnola, no. 56, Tax Code and VAT number 03957900487; Tel.: 0571 7076, Fax: 0571 707447, E-mail: [privacy@sammontana.it](mailto:privacy@sammontana.it); Certified email: [sammontana@legalmail.it](mailto:sammontana@legalmail.it).

### 3. Type of Personal Data Processed

In accordance with this Privacy Policy, personal data are those personal and contact details such as, by way of example but without limitation, name, surname, address, telephone number, email address (hereafter known jointly as "Personal Data" or just "Data") relating to natural persons, processed by Sammontana (hereafter "Data Subjects") for the establishment, execution and correct management of the contractual relationship established with Suppliers (hereafter, the "Contract").

### 4. Purpose and Legal Basis of Processing

Sammontana processes the Data of the Data Subjects manually or using electronic tools, for the following purposes:

	<b>Processing Purpose</b>	<b>Legal Basis of Processing</b>
A	To execute the Contract between Sammontana and the Supplier.	The processing implemented for this purpose is necessary to execute the Contract between Sammontana and the Supplier. It does not require specific consent from the data subject [Art. 6 par. 1 letter b) of the Regulation].
B	To exercise Sammontana's rights even judicially.	The processing implemented for this purpose is necessary to pursue the Data Controller's legitimate interest to ascertain, exercise or defend a right judicially. It does not require specific consent from the data subject [Art. 6 par. 1 letter f) of the Regulation].
C	To fulfil obligations deriving from applicable regulations, therein including making communications to the competent authorities and other supervisory bodies and to comply with requests from the same.	The processing implemented for this purpose is necessary to fulfil a legal obligation to which the Data Controller is subject. It does not require specific consent from the data subject [Art. 6 par. 1 letter c) of the Regulation].

### 5. Nature of Data Provision and Consequences of any Refusal

The provision of Personal Data is necessary to achieve the purposes listed above. Any refusal to provide them, in whole or in part, may involve the lack of conclusion or maintenance of the Contract.

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### **6. Recipients/Categories of Recipients of Personal Data**

Your Personal Data are processed by Sammontana's personnel authorised in accordance with Art. 4, par. 1, no. 10) and 29 of Regulation EU, in that sense instructed by the Data Controller, exclusively in relation to the duties performed and the purposes indicated in point 4.

In addition, entities used by Sammontana to perform its activities, which offer a suitable guarantee of respect of the rules on Personal Data processing, may also come to know of your Personal Data, in the capacity of external Processors in accordance with Art. 28 of Regulation EU.

Those entities may belong to the following categories: legal, administrative and tax consultants who assist Sammontana in conducting its business; external entities which perform specific assignments on behalf of the Company for corporate, accounting and tax fulfilments; financial and insurance operators; internet providers; cloud or IT service providers; bank institutions for managing receipts and payments deriving from the execution of the Contract; sub-suppliers/subcontractors engaged in activities connected to the execution of the Contract with the Controller; public institutions and/or judicial and/or supervisory authorities, if they so request. A specific and updated list of those entities is available from the Controller's office and can be consulted upon request by the data subject.

The Personal Data may also be communicated to public institutions to fulfil obligations provided by rules of law or regulations; entities to which the right to access your Personal Data is granted by laws or regulations (e.g. Tax Police, Police Forces, Local Public Safety Authorities, etc.) for the ascertainment and prosecution of unlawful conduct and the prevention and safeguarding of threats to public safety.

Your Personal Data may also be sent to third parties in the case of mergers, acquisitions, sales of businesses or business branches and other extraordinary operations, as well as to anyone who is the legitimate recipient of communications provided by rules of law or regulations. In coherence with the pursuit of the processing purposes indicated above, your Personal Data may also be communicated to other companies of the Group to which Sammontana S.p.A. belongs, which, established within the European Union, will process your Personal Data in respect of that Regulation.

Finally, your Data may be sent to the judicial or administrative Authorities to allow Sammontana to exercise or protect its rights or those of third parties or, in any case, for reasons connected to the protection of rights and freedoms of others.

Your Personal Data will not be disseminated.

### **7. Data Storage Period**

We inform you that your Data will be stored for a limited period of time, which varies based upon the type of processing activity and the specific purposes of the same, in accordance with the following examples:

- Personal Data processed to execute the Contract (point 4, letter A above): they may be stored for a maximum period of 10 (ten) years from the Contract termination;
- Personal Data processed to manage any judicial and/or extrajudicial disputes (point 4, letter B above): they will be stored for the period necessary until the end of those disputes.
- Personal Data processed for purposes of fulfilling the obligations provided by European and domestic legislation (point 4, letter C above): they will be stored for the periods imposed by the regulations;

At the end of those periods, your Data will be erased or made anonymous on a final basis and irreversibly so as no longer to be attributable to the Data Subject's identity.

### **8. Your Rights**

We inform you that you may exercise the following rights in relation to the Personal Data subject to this privacy policy, as provided and guaranteed by the Regulation:

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- **Right to access and rectification** (articles 15 and 16 of the Regulation): you have the right to access your Personal Data and to ask for the same to be corrected, modified or supplemented. If you wish, we will provide you with a copy of your Data in our possession.
- **Right to erasure of Data** (art. 17 of the Regulation): in the cases provided by the regulation in force, you may request the erasure of your Personal Data. Having received and analysed your request, we will cease the processing and erase your Personal Data if your request is considered legitimate.
- **Right to restriction of processing** (art. 18 of the Regulation): you have the right to request the restriction of processing of your Personal Data in the case of ascertained inaccuracy of the same or unlawful processing.
- **Right to Data portability** (art. 20 of the Regulation): you have the right to ask to obtain, from the Data Controller, your Personal Data in order to send them to another controller or to have them sent to another controller, in the cases provided by the cited article.
- **Right to object** (art. 21 of the Regulation): you have the right to object at any time to the processing of your Personal Data carried out on the basis of our legitimate interest, explaining the reasons that justify your request; Sammontana will stop any further processing of your Data, except if Sammontana can demonstrate the existence of legitimate reasons to proceed with the processing which prevail over your interests, rights and freedoms and for the establishment, exercise or defence of a legal claims.
- **Right to lodge a complaint** (art. 77 of the Regulation): without prejudice to any other administrative or jurisdictional recourse, if you believe that the processing of your Personal Data violates the regulations in force, you have the right to lodge a complaint before the competent Data Protection Supervisory Authority by the methods and in respect of the terms reported on the website of the Supervisory Authority (<http://www.garanteprivacy.it>).

At any time you may exercise your rights, with reference to the specific processing of your Personal Data by Sammontana, by contacting the Data Controller at the details indicated in point 2, possibly using the form provided on the Data Protection Authority's website (<https://www.garanteprivacy.it>).

Further information on your rights can be obtained by asking the Controller for a full extract of the articles cited above.

### 9. Security Measures

Sammontana adopts security measures with a view to safeguarding the confidentiality, integrity, completeness and availability of your Personal Data. Technical, logistical and organisational measures are developed with a view to preventing damages, losses, even accidental, alterations, improper or unauthorised use of the Personal Data processed.

The Data Controller

SAMMONTANA S.P.A.

The Supplier declares to have received, read and understood this privacy policy rendered in accordance with Regulation 2016/679.

Signature

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