

INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLE 13 OF REGULATION (EU) 2016/679

Dear Sirs,

Pursuant to Article 13 of Regulation (EU) 2016/679 (hereinafter the “**GDPR**”), Sirti S.p.A. (hereinafter “**Sirti**” or the “**Controller**”) wishes to inform you that the personal data concerning your company (hereinafter the “**Supplier**”) and the natural persons acting on its behalf (hereinafter the “**Data**”), collected from the Supplier, will be processed in accordance with the provisions of the GDPR and in accordance with the following information.

It is understood that it is the responsibility of the Supplier to inform the natural persons acting on its behalf of the processing of the personal data under this information notice and seek their consent, where required.

Data controller. Data processors.

The Data Controller is Sirti S.p.A., with registered office in Via Stamira D’Ancona, 9 – 20127 Milan, tel. 029588.1, e-mail privacy@sirti.it. The up-to-date list of any data processors is available at the offices of the Controller.

Data Protection Officer.

The data protection officer, designated by the Controller, may be contacted by:

- regular mail, to the address Via Stamira d’Ancona 9 - 20127 Milano, to the attention of the Data Protection Officer;
- telephone, to number 029588.1;
- e-mail, to the address privacy@sirti.it.

Purposes of, and legal basis for, the processing. Legitimate interests pursued.

Data will be processed:

- a) to pursue the legitimate interest that the Controller, based on the balancing of interests made, has recognised in the need to assess the technical, economic and financial suitability of the Supplier as well as to assess that the latter has the requirements necessary, within the designation process, for the purposes of inclusion in the suppliers data base of the Controller or its updating;
- b) to comply with a legal obligation to which the Controller is subject;
- c) to perform contracts to which the Supplier is party or in order to take steps at the request of the Supplier prior to entering into a contract;
- d) to pursue the legitimate interest recognised by the Controller, based on the balancing of interests made, where necessary for the establishment, exercise or defence of legal claims.

Data processing for the purposes under a) and d) shall not require the Supplier’s consent, processing being necessary for the purposes of the legitimate interests pursued by the Controller, pursuant to Article 6, paragraph 1, letter f) of the GDPR. Data processing for the purposes c) shall not require the Supplier’s consent, processing being necessary for the performance of contracts to which the Supplier is party or in order to take steps at the request of the Supplier prior to entering into a contract, pursuant to Article 6, paragraph 1, letter b) of the GDPR.

Provision of data and consequences of refusal.

The provision of Data for the purposes under b) and c) above is, respectively, a legal and contractual obligation. Instead, the provision of Data for the purposes under a) and d) is optional but necessary to pursue the legitimate interests of the Controller set out above. In all these cases, failure to provide Data shall involve the Controller being prevented from establishing business relationships with the Supplier.

Methods of processing.

Data will be processed manually and electronically, also by inclusion and organisation in databases, in compliance with the provisions of the GDPR on security measures.

Recipients or categories of recipients.

Data may be made accessible, disclosed or communicated to the following persons, to be appointed by the Controller, depending on the cases, as processors or persons in charge of the processing:

- companies of the group to which the Controller belongs (parent companies, subsidiaries, affiliated companies), employees and/or collaborators in whatever capacity of the Controller and/or of companies of the group to which the Controller belongs;
- public or private persons, natural persons or legal entities, to whom the Controller may resort to carry out the activities instrumental to achieving the above-mentioned goals or to whom the Controller is statutorily or contractually required to disclose the Data.

Data shall in no event be disseminated.

Storage time.

Data and Contact Data will be stored for a period of time equivalent to the limitation period of the rights enforceable by the Controller, as applicable from time to time.

Rights of access, erasure, restriction and portability.

Data subjects shall have the rights set out in Articles 15-20 of the GDPR. By way of example, each data subject shall have the right:

- a) to obtain confirmation as to whether or not Data concerning him or her are being processed;
- b) if Data is being processed, to obtain access to the personal data and to the information relating to the processing as well as to request a copy of the personal data;
- c) to obtain rectification of inaccurate personal data and to have incomplete personal data completed;
- d) if any of the conditions under Article 17 of the GDPR exists, to obtain the erasure of the personal data concerning him or her;
- e) in the cases provided for by Article 18 of the GDPR, to obtain restriction of processing;
- f) to receive the personal data concerning him or her in a structured, commonly used and machine-readable format, and to transmit it to another controller, where technically feasible.

Right to object.

Each data subject shall have the right to object at any time to the processing of personal data concerning him or her carried out to pursue the legitimate interests of the Controller. In case of objection, personal data shall no longer be processed, unless there are legitimate grounds for processing that override the interests, rights and freedoms of the data subject or when required for the establishment, exercise or defence of legal claims.

Right to lodge a complaint with the Data Protection Authority.

Furthermore, each data subject shall be entitled to lodge a complaint with the Data Protection Authority if the data subject considers that his or her rights under the GDPR are infringed, according to the terms and conditions set out in the Data Protection Authority website at the address: www.garanteprivacy.it.

Date, _____

Signature (for acknowledgement)
