

## Information on the processing of personal data

pursuant to Article 13, Regulation (EU) 2016/679  
(General Data Protection Regulation - GDPR)

Pursuant to the rules set out to protect the processing of personal data (Regulation EU 2016/679 - General Data Protection Regulation, or GDPR), we inform you (the "Supplier") that Cedacri S.p.A. ("Cedacri") will process certain personal data in order to establish and manage correctly, also in light of specific internal procedures, the relationship with its suppliers.

### Categories of personal data

Suppliers are required to provide certain personal data: this mainly consists of identification data (e.g. name and surname, company name, VAT number, phone number, e-mail addresses), and some economic information (e.g. bank account number).

### Purpose of personal data processing

The processing of personal data is necessary for:

- the performance of the contract to which the Supplier is a party (Art. 6(1)(b) GDPR). In particular, the data will be used for the proper establishment and management of the relationship with the Supplier, as well as to proceed with the fulfilments linked with the contract itself;
- complying with the obligations imposed on Cedacri by laws and regulations (Art. 6(1)(c) GDPR), where relevant to the existing relationship;
- pursuing Cedacri's legitimate interest (Art. 6(1)(f) GDPR) in verifying the Supplier's compliance with the requirements of internal procedures regarding solvency, information security, protection of personal data, compliance with regulations in force on different matters;
- pursuing Cedacri's legitimate interest (Art. 6(1)(f) GDPR) in establishing, exercising or defending its rights in court.

### Mandatory or optional nature of providing personal data

The provision of the above-mentioned personal data is mandatory. Failure to provide such data may preclude the establishment or proper management of the relationship.

### Methods of processing personal data

Personal data are processed in compliance with legal provisions and Cedacri's obligations of confidentiality, by means of IT, telematic and manual tools, with logics related to the purposes identified above.

Personal data are stored and protected by means of technical and organisational measures, such as to ensure a level of security appropriate to the risks of varying likelihood and severity to the rights and freedoms of the data subjects, for the time necessary to fulfil the purposes described.

Specifically, suppliers' personal data will be retained according to the statute of limitation of rights, within the limits established under applicable contractual, accounting and tax regulations, as well as to pursue Cedacri's legitimate interest in defending itself in and out of court.

The processing activities are not supported by automated decision-making processes, including profiling, that produce legal effects on data subjects or similarly affect them.

Personal data will not be disseminated.

### Transfer of personal data

As a rule, personal data provided to Cedacri are processed within the European Union. However, it is possible that, for the performance of specific activities, some personal data may be transmitted to third parties, such as service providers and companies of the Group to which Cedacri belongs, based in a country outside the European Union.

Cedacri ensures that the transfer of personal data complies with the current requirements of the GDPR.

#### **CEDACRI S.p.A.**

Iscrizione al Registro delle Imprese  
di Milano Monza Brianza Lodi e  
Codice Fiscale 00432960342,  
Rappresentante del Gruppo IVA  
Cedacri - P.IVA 02952290340  
Numero REA MI - 2075277  
Capitale Sociale: 12.609.000 € i.v.

#### **Sede legale**

20122 Milano  
Corso Monforte, 30  
Tel. 0521.8071  
Fax 0521.807372

43044 Collecchio (PR)  
Via del Conventino,1  
Tel. 0521 8071

15073 Castellazzo Bormida (AL)  
Via Liguria, 529  
Tel 0131 272111

70132 Bari  
Viale G. Degennaro,1  
Tel 080 3856711

25132 Brescia  
Via Valcamonica,17/A  
Tel 030 318650

20090 Assago (MI)  
Via Strada 1, F5/F6  
Tel. 0521 8071

00128 Roma  
Via Elio Chianesi,110/d  
Tel. 0521 8071

[www.cedacri.it](http://www.cedacri.it)

Specifically, the transfer will be carried out in the presence of: i) an adequacy decision issued by the European Commission, pursuant to Art. 45 of the GDPR, which has decided that the third country, or more specified sectors within the third country, ensures an adequate level of protection of the data subject's rights; ii) appropriate safeguards, such as binding corporate rules or standard data protection clauses adopted by the Commission pursuant to Art. 46(2)(b) and (c) of the GDPR, supplemented, where appropriate or necessary, by specific additional measures aimed at ensuring a level of protection equivalent to that provided by the GDPR; iii) in the absence of the conditions and safeguards under (i) and (ii) above, the explicit consent of the data subject pursuant to Art. 49(1)(a) of the GDPR.

The Supplier may request further information on this matter by contacting the Privacy Office, at the e-mail address [ufficioprivacy-cedacri@iongroup.com](mailto:ufficioprivacy-cedacri@iongroup.com), or the DPO, at the contact details indicated below.

### **Identity and contact details of the data controller**

The data controller is Cedacri S.p.A., with registered office in Milan, Corso Monforte 30.

### **Identity and contact details of the Data Protection Officer (DPO)**

Cedacri has appointed a Data Protection Officer (DPO). The DPO can be contacted for any clarifications or requests at Cedacri's office in Castellazzo Bormida (AL), via Liguria 529, and at the e-mail address [rp\\_d\\_members-cedacri@iongroup.com](mailto:rp_d_members-cedacri@iongroup.com), or +39131272324.

### **Subjects who may process personal data**

Personal data may be communicated to the following subjects, who shall be appointed by Cedacri, as the case may be, as persons authorised to process data or data processors, or shall act as autonomous data controllers:

- employees and/or collaborators of Cedacri;
- companies of the Group to which Cedacri belongs;
- private or public entities, natural or legal persons, which Cedacri avails itself for the achievement of the purposes above (e.g. services providers) or to which Cedacri is required to communicate the personal data, by virtue of contractual or legal obligations (e.g. clients or public authorities).

### **Rights of the data subject**

Cedacri informs you that the current legislation on the protection of personal data grants data subjects specific rights, subject to the conditions established under the GDPR.

Specifically, the data subject has the right to obtain from the data controller confirmation as to whether or not personal data relating to him/her are being processed and, if so, to obtain access to the personal data and information identified in Art. 15 GDPR, such as: the purpose of the processing; the categories of personal data processed; the recipients or categories of recipients to whom such data will be disclosed, in particular if they are recipients from third countries or international organisations; where possible, the period of retention of personal data, or the criteria used to determine that period.

The data subject shall have the right to ask Cedacri to rectify any inaccurate personal data concerning him/her without undue delay. The data subject shall also have the right to obtain the integration of any incomplete data.

The data subject has the right to request the deletion of personal data provided, the portability of such data, the restriction of the processing of personal data concerning him/her, or to object to their processing carried out to pursue the controller's legitimate interest.

The data subject has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) in the manner specified by this authority.

For any clarification, as well as for the exercise of the aforementioned rights, please contact Cedacri's Privacy Office or the DPO at the contact details indicated above.

Requests relating to the exercise of rights may be sent by the data subject to the contact details indicated above using the form available at <http://www.cedacri.it/cedacri/downloads/Q064-01-Modello-esercizio-dei-diritti-degli-interessati.pdf> or on the website of the Italian Data Protection Authority.

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