



PRIVACY POLICY FOR THE SUPPLIER

MSY_DVO-G026

Rev. 2

31/01/2022

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PRIVACY POLICY

pursuant to articles 13 and 14 of EU regulation 2016/679

SUPPLIERS

E80 Group S.p.A (hereinafter referred to as "E80" or "the Company") in the capacity of "Data Controller", before allowing you to access the corporate premises, kindly ask you to read carefully the privacy policy submitted to you regarding the protection of personal data. Said privacy policy has been drawn up pursuant to the Legislative Decree n° 196/2003 ("Privacy Code") and subsequent amendments and additions and pursuant to art. 13 of the European Regulation n° 679/2016 related to the protection of personal data ("Regulation") and the Provision in video surveillance dated 08.04.2010 of the Garantor to protect personal data and the Guidelines of the EDPB dated July 2019.

We would like to inform our suppliers that our company E80 Group S.p.A has activated a video surveillance system in all the corporate access and perimeter areas only with the aim of protecting people and things from third parties, preserving the corporate assets and preventing acts of vandalism or theft. All the areas where the video surveillance systems are installed are identified by means of brief notice placards.

Purpose of the processing

The collection and processing of your personal data by the Data Controller will take place in order to attain the following purposes:

- a. **ESTABLISHMENT AND EXECUTION OF THE SUPPLY/SERVICE CONTRACT**, which for exemple takes the form of pre-contractual activities, signing and execution of the contract and management of suppliers.

Legal basis of the processing: the processing of the data collected is justified by the signed contract related to service, procurement or supply of assets or services (art. 6 par.1 lett. b GDPR) and by the vested interest of the Data Controller (art. 6 lett. f).

Recipients of the data: the data collected in connection with the stated purpose can be transmitted to: in their capacity as authorized subjects, the members of the corporate bodies and to the Data Controller's administrative staff; to banks to collect the charges due, to professional law firms or firms of certified accountants, to insurance companies or IT consultants; to data processors as per the list available from the Data Controller.

No disclosure of data is envisioned.



E80 Group S.p.A.

Direzione e coordinamento: Eagle S.r.l.

Sede legale in Via G. Marconi, 21 - 42030 Viano (RE), Italia

Tel. (+39) 0522 762011 - Fax (+39) 0522 988481 - E-mail: info@e80group.com - PEC: e80group@pec.it - www.e80group.com

Capitale Sociale € 1.061.818 i.v. - R.E.A. della C.C.I.A.A. di Reggio Emilia n. 227884 - Codice Ateco 28.99.20

Codice Fiscale e Registro delle Imprese di Reggio Emilia IT01835150358

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Duration of the processing: the data collected in relation to the afore-mentioned purpose will be stored, for any cause, until the termination of the contractual relationship or, in case of longer duration, until the expiry of the ordinary period of limitation for the contractual liability, without prejudice to the specific requirements of additional data storage in relation to the contractual relationship elapsed.

Non-communication of the data: providing the necessary data to attain the stated purposes is a contractual obligation that the data subject must fulfil. The non-communication by the data subject implies the impossibility to execute the contract and may give rise to a failure to comply that is likely to cause the termination of the contract.

- b. **FULFILMENT OF LEGAL OBLIGATIONS**, that for example takes the form of administrative and accounting obligations, legal publicity obligations (constitutive or declaratory), tax obligations, anti-money laundering obligations, prevention of Covid-19 infection in the emergency period, check of green certificate pursuant to art. 3 DL 21 September 2021 n° 127.

Legal basis of the processing: the processing of the collected data is justified by the compliance with the legal obligations by the Data Controller (art. 6 par. 1 lett. c GDPR).

Recipients of the data: the data collected in relation to the stated purpose can be transmitted to: banks to collect the tax and social security charges, to the Revenue Agency. In their capacity as authorized subjects, to the members of the corporate bodies and to the Data Controller's administrative staff; to professional law firms and firms of certified accountants, to insurance companies, to IT consultants; to data processors as per the list available from the Data Controller (companies and consultants for activities related to maintenance, control or verification of the tools used for processing).

No disclosure of data is envisioned.

Duration of processing: the data collected in relation to the afore-mentioned purpose will be stored for the length of time allowed by the regulation that requires the processing or for the longer limitation statute of the relevant rights, without prejudice to the specific requirements of additional data storage in connection with the legal obligations occurred.



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Non-communication of the data: providing data is compulsory and necessary to comply with the obligations under the law. The refusal to provide the data for said purpose determines the impossibility of continuing the relationship.

Nature of the personal data

Please be informed that the data requested by E80 Group S.p.A. (name, surname, contact details and bank details) will be processed by the Company in compliance with the national and European regulations including any provisions issued by the Control Authority (Authority for the protection of personal data) where applicable.

Video surveillance

With reference to the images recorded by the video surveillance system active at the company registered offices, present in the areas indicated with special billboards, please be informed that:

- the images will be recorded and processed in a lawful way to protect the corporate assets;
- the video surveillance system is fitted with video cameras connected with a recording system;
- only authorized internal staff can access the recorded images.

Data processing methods

The personal data will be processed by the company and subjects authorized to do it in the master data register; they will be filed in our database and processed electronically, telematically and on paper according to the principles of law and protecting the confidentiality of the data subject and his/her rights by adopting suitable technical and organizational measures to guarantee a safety level appropriate to the risk. The provision of data is not mandatory but the refusal to grant permission for your data to be processed will imply the impossibility by the company to carry out the ordinary management activities related to the established business relationship.

Communication, distribution and transfer of data

The above-mentioned personal data can be communicated only for the above-mentioned purposes to specific third parties (even abroad), among which legal consultants, firms of certified accountants, banks, suppliers of transport services, associated companies, subsidiaries and parent companies, within the limits established by the afore-mentioned data processing purposes or for internal organizational reasons. These parties act according to the company instructions as data processors on the basis of special contractual agreements.



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Other parties could become aware of personal data in their capacity as data processors or as subjects authorized for the processing, as in the case of our employees that are entrusted with the tasks necessary to execute the contract that you signed and the data processors appointed by the company and authorized on the basis of the agreement related to the personal data processing. Without prejudice to the communications made in compliance with the legal obligations, the personal data provided will not be communicated to third parties nor published.

The health data collected during the emergency period to prevent Covid-19 infection can be communicated only to the health authorities in the area. There will be no transfer of personal data collected in extra- EU countries. Presently the servers are located in Italy. The data will not be transferred outside the European Union. In any case, it is understood that, if it is necessary to move the location of servers to Italy and/or to the European Union and/or to extra-EU countries, said transfer will take place in accordance with articles 45 and following GDPR. In this case, at any rate, the Data Controller ensures you right now that the transfer of data to extra-EU countries will take place in compliance with the applicable legal requirements, if necessary, signing agreements that guarantee an adequate protection level and/adopting the standard contractual clauses provided for by the European Commission.

Storage of data and rights of the data subject

The personal data that you provided us with will be processed by the Data Controller for the duration of time of your contractual relationship with E80 Group Spa; afterwards they will be stored only to comply with the existing legal requirements for administrative purposes and/or to enforce one's right in case of litigation and pre-litigation. Furthermore, please be informed that, pursuant to articles 5 and 89.1 of the Regulation, your personal data can be stored for periods of time longer than those mentioned in the previous paragraph [for statistical purposes only], without prejudice to the implementation of adequate technical and organizational measures required by the law to protect your rights and your freedom. In any case, the Data Controller will process the personal data for the time strictly necessary to fulfil the purposes set out above, in compliance with the principles of minimisation and limitation of the storage referred to in art. 5, paragraph 1, letters c), e), GDPR. To that end, the Data Controller will cancel the images collected through the video surveillance plant, 7 days after their recording.



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Rights of the data subject

As the data subject, you are entitled to exercise your rights provided by articles 15,16,17,18,20,21,22 of GDPR addressing your requests to the following reference email: privacy@e80group.com. In particular, pursuant to art. 13, paragraph 2, letter b) GDPR, in relation to the referenced personal data processing in order to guarantee a correct and transparent processing, the following rights can be exercised:

- Right to information and access (ex art. 15 GDPR): in order to obtain from the Data Controller information about the existence of data processings that concern you and the access to your personal data and to information on the processing purposes, the recipients or the categories of recipients to which the data are transmitted.
- Right to rectification (ex art. 16 GDPR), to erasure (ex art. 17 GDPR) and to restriction (ex art. 18 GDPR): in order to ask the Data Controller for the rectification and the erasure of your personal data and the processing restriction.
- Right to portability (ex art. 20 GDPR): in order to receive in a structured format, of common use and readable by an automatic device, the personal data that concern you transmitted to the Data Controller; you are entitled to transmit said data to another Data Controller, provided that said operation is technically viable.
- Right of objection (ex art. 21 GDPR): right to object to your data processing.

Furthermore, please be informed that you are entitled to lodge a complaint before the Italian Supervisory Authority, "the Authority for the Protection of Personal Data" if you deem that your rights have been infringed by the Data Controller and/or by a third party.

Personal references of ownership

Enrico Grassi, in the capacity of Legal Representative of E80 GROUP S.P.A., "Data Controller".

Valeria Prampolini, in the capacity of "Data Protection Manager".

Data Controller

The Data Controller is E80 Group S.p.A., with registered offices in Via G. Marconi, 21 - 42030 Viano - Reggio Emilia.

Viano (RE) E80 GROUP SPA

Name

**Signature for acknowledgement of
the data subject to the processing**



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