

INFORMATION ON THE PROCESSING OF PERSONAL DATA ADDRESSED TO OUR SUPPLIERS

provided under articles 13-14 - Reg. 2016/679/EU "on the protection of natural persons with regard to the processing of personal data and on the free movement of such data" (hereinafter "GDPR")

GIVEN THAT

- According to article 4, parag. 1, n. 7 of GDPR the "Controller" is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;
- According to article 4, parag. 1, n. 1 of GDPR a "Personal Data" is any information relating to an identified or identifiable natural person («Data subject»);
- According to article 14, parag. 3 of GDPR in the case of relationships between legal persons, the information provided through the customer (legal person) will be issued to any Data subject involved in the relating processing at time of the first communication to that data subject.

ALL OF THIS PREMISED

We inform you that the execution of the supply contract implies the need to process some information concerning individuals.

However, we would like to reassure you about the use of this information, which will be processed by S.C.M. Tecnologie S.r.l., having its place of business in 46051 – San Giorgio Bigarello (MN), via Einstein, n. 6/A, P.I. 02235340201, Phone +39 0376 321936, e-mail info@scmtec.com, as the **Controller**, in respect of the fundamental rights of the individual, as well as in compliance with the provisions on personal data protection.

SOURCE AND TYPE OF PERSONAL DATA

The management of the supply contract involves the collection and processing of personal data, in particular: identifiers (name, surname, e-mail address), accounting and fiscal, directly referred to the customer (if natural person) or, for identification and contact Data, referred to other Data subjects (such as workers, employees, representatives, etc.). These Data are collected in execution and in the performance of commercial relationships with the Controller and in compliance with the provisions concerning the processing and the protection of personal data.

In order to follow up on your request, the aforementioned data are essential: remain free not to provide us with such data; however, in this case it may not be possible to proceed with the fulfillment of the order as requested.

PURPOSES OF THE PROCESSING

The data collected are processed for the pursuit of instrumental and/or complementary activities statutorily expressed and functional to the performance of the contractual or pre-contractual relationship existing with the Customer with regard to the products requested, in particular:

- Registry of the new Supplier and contact details of the contact person within the management software;
- Internal communication;
- Invoicing, accounting and financial statements;

If the Controller intends to further process personal data for a purpose different from that for which they have been collected, it will provide any necessary information in advance to the Data subject.

The Controller does not use the contact data collected for sending newsletters.



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The Controller does not perform profiling activities related to direct marketing and does not use artificial intelligence systems to make decisions based solely on automated processing, including profiling, which produce legal effects concerning the data subjects or similarly significantly affect them within the meaning of Article 22 of Regulation (EU) 2016/679.

LEGAL BASIS OF THE PROCESSING

The processing takes place in order to perfect and execute a contract that the Supplier is a part of and whose object is the supply of the service or product.

In cases it is prescribed by sector legislation (e.g. invoicing, taxation or anti-money laundering law), the processing of Personal Data of natural person will take place on the basis of a regulatory obligation to which the Controller is bound to comply.

RETENTION PERIOD

The personal data collected will be kept for the time necessary for the execution of the supply contract, including the time related to the delivery of the product or the execution of the service. The Controller may continue to keep such Data for a longer period in order to be able to handle any disputes related to the supply.

The processing for administrative and accounting purposes involves a data retention according to the terms established by the regulations: 10 years, pursuant to art. 2220 c.c. In these cases, will be kept the only data strictly necessary for these purposes.

HOW WE PROCESS PERSONAL DATA

The data collected are processed in computer, electronic and paper form with logic strictly related to the stated purposes and in any case in order to guarantee the security and confidentiality of the data. The documentation is archived both electronically and on paper. Some essential information:

- The collection of personal data is limited to the minimum necessary for each specific purpose of the processing;
- The processing of personal data is limited to the purposes for which it was collected;
- The storage of personal data is limited to the minimum necessary for each specific purpose of the processing;
- Personal data collected and processed in electronic form are stored in encrypted form.
- Personal data are not provided to commercial third parties;
- Personal data are not sold or rented.

The collected data are stored in a management software and are processed in electronic and paper form, in compliance with the principles established by the legislation on personal data protection.

USE OF ARTIFICIAL INTELLIGENCE SYSTEMS

In carrying out the activities related to the relationship with the Supplier, the Controller may make use of tools based on artificial intelligence systems solely as support tools (for example, to draft or summarise documents and communications). In the course of such use, personal data relating to natural persons – such as the names and contact details of the Supplier's representatives, collaborators or employees – possibly contained in the documents and communications processed may be processed. Such processing takes place for the same purposes and on the same legal basis indicated in this notice, in compliance with the principles of minimisation, security and confidentiality: the outputs produced by the systems are always subject to review by authorised personnel, no unnecessary or



confidential data are entered into the tools, and the data are not used to train third-party systems in the absence of adequate safeguards.

COMMUNICATION OF PERSONAL DATA

The processing operations are performed by persons specifically designated by the Data Controller in writing or otherwise authorized to access the information, which are adequately informed about the protection of personal data. In pursuing the aforementioned purposes, the Controller may communicate some of the data collected to external companies, identified from time to time as independent data Controllers or Processors: appropriate measures will be taken to ensure the protection of personal data. Below, we provide you with a list of the categories of subjects who, in pursuing the aforementioned purposes, may become aware of certain categories of data provided:

- ☐ Subjects whose communication is required by the Bylaws, by law, by regulation or by national and Union legislation, as well as for the performance of contractual or pre-contractual obligations
- ☐ Consultants who take care of the tax obligations on behalf of the Controller, designated as Processor.
- ☐ Banks, credit institutions and companies closely linked to the collection of credit.
- ☐ Legal advisors (e.g. credit recovery and contractual advice).
- ☐ IT companies, designated for this purpose Data Processors, to the extent that they access the information systems during their maintenance activities;
- ☐ Shipping companies and couriers, in order to ensure the pick up of the requested products.

Personal data collected will not be transferred to non-EU countries

THE RIGHTS OF THE DATA SUBJECTS

At any time the Data Subject may exercise his/her rights towards the Data Controller, in accordance with EU Regulation 2016/679 through the following addresses: info@scmtec.com - S.C.M. Tecnologie S.r.l., with headquarters in 46030 - San Giorgio di Mantova (MN), via Einstein, n. 6 / A (for written communications), in person of the legal representative. To guarantee the correct exercise of the rights, the Data Subject must be identifiable in an unequivocal manner. The organization undertakes to provide feedback within 30 days and, if it is impossible to comply with these deadlines, to justify the possible extension of the deadlines. The response will be free of charge except in cases of groundlessness (e.g. there are no data concerning the applicant applicant) or excessive requests (e.g. repetitive over time) for which an expense contribution may be charged. The rights related to personal data concerning deceased persons may be exercised by those who have an interest of their own or act to protect the data subject or for family reasons deserving protection. The data subject can also submit a complaint to the supervisory authority. In case of violation of personal data received by the organization, the Controller will proceed to notify the competent supervisory authority of the violation within 72 hours from the happening and will also communicate the event to the interested

In particular, the interested party has the right to obtain the indication of:

- Origin of personal data;
- Categories of data;
- Purposes and methods of treatment;
- Retention period;
- Logic applied in case of treatment carried out with the aid of electronic instruments;
- Identification of the Controller;
- Subjects and categories of subjects to whom personal data may be communicated or who may become aware of them as responsible or authorized;
- Existence of profiling processes.

Moreover, the interested party will always have the right to obtain:





S.C.M. TECNOLOGIE s.r.l. a Socio Unico
via Einstein 6/A | 46051 San Giorgio Bigarello (MN) Italy
T. +39 0376 321936 | F. +39 0376 364472 | www.scmtec.com

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info@scmtec.com | PEC: scmtecnologie@cert.mantovaexport.it

- Confirmation of the existence or otherwise of their personal data and that such data be made available in an intelligible form;
- Updating, correction, integration of data and limitation;
- Cancellation, transformation into anonymous form or blocking of data processed in violation of the law (including those for which storage is not necessary in relation to the purposes for which they were collected or subsequently processed);
- Attestation that the operations referred to in the points above have been brought to the attention of those to whom the data have been communicated or disseminated, except in the case where this fulfillment proves impossible or involves a use of means manifestly disproportionate to the protected right organization;
- Copy of the data being processed.

Data subjects can exercise their rights by writing to info@scmtec.com.

Data Subjects have the right to complain to the Supervisory Authority, or to refer to the Judicial Authority, for the protection of their rights.

