

INFORMATION ON THE PROCESSING OF SUPPLIERS PERSONAL DATA

ACCORDING TO ART. 13 OF THE EUROPEAN REGULATION 2016/679 (GDPR) AND OF THE LEGISLATIVE DECREE. N. 196/2003, AS AMENDED BY THE LEGISLATIVE DECREE. No. 101/2018

To better understand this notice, it is specified that the Data Controller is the natural or legal person who determines the purposes and means of processing personal data.

Personal data is information about an identified or identifiable natural and legal person, defined as "Data Subject"; in this case, the interested party is the owner's supplier.

This notice consists of 2 (two) pages.

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1. Personal data controller

STEELTRADE S.R.L., in the person of the legal representative pro tempore, with registered office in 29010 – Rottofreno, Cattagnina district (PC), via Abruzzo n. 26, VAT/P.I. 00404960338, certified email steeltrade.gdpr@pec.spt.it, as Data Controller of personal data, informs its Suppliers, including any natural person consultants, that - according to applicable national legislation and art. 13, EU Reg. 2016/679 - the personal data provided will be processed as follows.

2. Type of data processed.

The personal data communicated directly by the Supplier to the Data Controller are:

- a) for natural persons, including employees and/or collaborators of the Supplier, whether natural or legal person, with whom the Data Controller has stipulated a contract, even verbal (in this case the source from which the data comes is the Supplier), are: name, surname, place and date of birth, tax code, address of residence and/or domicile and/or residence, e-mail address and/or certified e-mail address, landline telephone numbers and/or mobile, bank details, unique code for electronic invoicing;
- b) for individual businesses and legal persons, in addition to the data referred to in the previous point: company name, registered office, tax code, VAT number, ATECO code, e-mail address and/or certified e-mail address, landline telephone numbers and/or mobile, bank details, unique code for electronic invoicing.

The Data Controller reserves the right to integrate the personal data to be processed; in this case the Data Controller will ask for the signature of a specific consent.

3. Purpose of processing and legal basis.

The Data Controller carries out the data processing in the development of its activities and for the following purposes:

- management of the existing contract with the Supplier;

- accounting and tax administration;
- telematic data transmission;
- fulfilment of legal obligations.

For these purposes, the data communication to the Data Controller is a necessary requirement for the execution of the contract, also verbal, of which the Supplier is a party (art. 6, n. 1, letter b) of the GDPR), for the pursuit of a legitimate interest of the Data Controller (such as: managing complaints and/or disputes, recovering debts, preventing illegal activities, exercising the right of defense in court), for the fulfilment of tax, accounting and legal obligations.

4. Processing methods

Personal data are processed by the Data Controller on IT and/or paper supports, for which the Data Controller has adopted specific security measures to prevent their loss and illegal, incorrect, and unauthorized use.

The Data Controller does not process personal data with automated decision-making processes, including profiling.

5. Access, communication and disclosure of personal data to third parties.

Personal data will be processed, to the extent necessary, by the appropriately instructed and trained authorized personnel of the Data Controller as well as by the personnel of third parties who provide services to the Data Controller and carry out data processing on behalf and on instructions of the latter as authorized, appointed and/or data controllers, according to articles. 28 and 29 of the GDPR.

Personal data may be made accessible and/or communicated to third parties only for the purposes in point no. 3) of this notice.

In case of communication to third parties, the recipients may be:

- consultants and/or freelancers in single or associated form;
- companies and/or public and/or private bodies for which the communication of data is mandatory and/or necessary for the correct execution of the requested activity and for the fulfilment of legal obligations (by way of example, but not exhaustive, these are banks and credit institutions, social security and/or welfare institutions, Chambers of Commerce, Industry, Crafts and Agriculture, Revenue Agency, etc.);
- persons who carry out control, review and certification activities carried out by the Data Controller, consultants and freelancers in the context of tax and judicial assistance services, public bodies, as well as subjects legitimated by law to receive such information, Italian and foreign judicial authorities and other public authorities, for purposes related to the fulfilment of legal obligations, or for the completion of the obligations undertaken, including for defence needs in court.

The data, stored on servers located at the Data Controller's registered office, will not be disclosed in any way and will not be transferred to third countries or international organizations.

6. Data retention period.

The Data Controller retains personal data for no longer than 10 years from the end of the relationship with the Interested Party for the purposes established by law, including accounting and reporting.

7. Rights of the Data Subject..

The Data Subject may exercise, about the data processing described therein, the rights expected by the GDPR (articles 15-22), including:

- receive confirmation of the existence of the Data and access their content (access rights);
- update, modify and/or correct the Data (right of amendment);
- request the cancellation or limitation of the Data processed in violation of the law, including those whose retention is not necessary about the purposes for which the Data were collected or otherwise processed (right to be forgotten and right to limitation);
- oppose to the processing (right of opposition);
- file a complaint with the Supervisory Authority (Guarantor of personal data protection www.garanteprivacy.it) in case of violation of the regulations on the protection of personal data;
- receive a copy in electronic format of the Data concerning him as an interested party, when such Data has been provided in the context of the contract and request that such Data be transmitted to another data controller (right to data portability);
- revoke consent at any time without affecting the lawfulness of the processing based on the consent given before the revocation;
- file a complaint with the guarantor of personal data protection, pursuant to art. 77 et seq. of the GDPR.

The interested party is invited to contact the Data Controller directly before contacting the Guarantor Authority.

In this regard, it is specified that the rights referred to in articles. 15-22 of the GDPR cannot be exercised with a request to the Data Controller or with a complaint under Article 77 of the GDPR, according to the limitations provided for by the articles. 2undecies and 2duodeces of Legislative Decree no. 196/2003, as amended by Legislative Decree no. 101/2018.

To exercise their rights, the interested party can contact the Data Controller by sending a communication to the certified e-mail address steeltrade.gdpr@pec.spt.it

The Data Controller will provide an adequate response within one month of receiving the request; only in cases of severe complexity and a high number of requests can this deadline be extended by 2 (two) months.

8. Amendments to this notice.

This policy may be subject to amendments; therefore, it will be the Data Controller's responsibility to notify the Data Subject of any substantial updates.

9. Contacts.

In case of questions on the processing of personal data by the Data Controller, you can send a communication to the certified e-mail address steeltrade.gdpr@pec.spt.it

Rottofreno, Cattagnina district, 19/04/2024 STEELTRADE S.R.L.



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