

## INFORMATION PROCESSING OF PERSONAL DATA

pursuant to Article 13 of Regulation (EU) 2016/679

Dear Supplier,

ICMA San Giorgio SPA, aware of the importance of protecting fundamental rights and freedoms, including with regard to personal data, undertakes to be transparent about the way in which it is used and the people with whom it is shared.

Given that the data relating to legal entities do not fall within the definition of personal data, we invite our suppliers to view, even in this case, the information below because the execution of the contract could involve the processing of data of natural persons of reference.

### Data controller is

ICMA San Giorgio Spa  
Via Madonnina, 75 - 20010 San Giorgio su Legnano  
E-mail [sales@icmasg.it](mailto:sales@icmasg.it) Phone 0331/407004

### Purpose and legal basis of the Processing

The data relating to the suppliers of ICMA San Giorgio SPA will be processed for:

- a) execution of a contract of which the interested person is a party or for the execution of pre-contractual measures adopted at the request of the same (Art. 6, paragraph 1, lett. b - Reg. EU 679/2016)

The data will also be processed for:

- b) comply with a legal obligation to which the Data Controller is subject (Art. 6, paragraph 1, lett. c - Reg. EU 679/2016), in particular for the fulfillment of legal obligations of a fiscal nature deriving from the contract signed.

The data may also be processed for:

- c) pursuit of the legitimate interest of the Data Controller (Article 6, paragraph 1, letter a - Reg. EU 679/2016), in particular for the exercise and defense of a right of the Data Controller or third parties in court or out-of-court and for insurance protection purposes.

### Categories of recipients of personal data

In an appropriate, relevant and limited way to what is necessary for the purposes pursued above, including the need to perform treatments entrusted by the Data Controller in outsourcing, the data may be processed by the following categories of recipients:

- accountant, for tax and accounting assistance;
- IT service providers such as: cloud services, e-mail, electronic invoicing and substitute storage, technical assistance and maintenance services, hardware and software that could, even indirectly, access personal data.
- bank support institute, for the management of payments;
- insurance companies, in the event of accidents involving the interested party;
- legal studies, for possible assistance in court and out-of-court;
- Suppliers that provide consulting services in the fields of organization, management, administration, environmental, hygiene and safety at work, security and protection of personal data and professionals who perform responsibilities (RSPP, etc.);
- Subjects for whom the communication of data is necessary for a legal obligation of the Data Controller or the Data Processor.

Where applicable, the Data Controller has bound the processing of data by the aforementioned recipients through a contract or other legal act that governs the processing of data pursuant to art. 28 of EU Regulation 679/2016.

ICMA San Giorgio SPA undertakes to qualify the intended recipients also from the point of view of the guarantees provided to protect the confidentiality of data and regulatory compliance. The interested party may request the name of those recipients at any time.

The Data Controller has defined, in view of the fundamental principles established by current legislation, the persons authorized to process personal data under their direct authority. These persons act on the basis of specific instructions provided for the purposes and methods of the processing.

### Data retention period

The personal data will be kept for the time necessary to the requirements related to the contract, as well as for the fulfillment of legal obligations of a fiscal nature and for purposes related to the possible assessment, exercise and defense of the right of the Data Controller or third parties and, therefore, until the expiration of each term of forfeiture and statutory prescription. The personal data, therefore, will be kept up to a maximum of 10 years from the end of the contract, except for a lengthening of the time due to judicial and extrajudicial procedures and other to settle disputes between the Data Controller and the Data Subject.

### Fundamental rights of the data subject and how to exercise them

The interested party, in accordance with EU Regulation 679/2016, can exercise the following rights:

- a) **Right of access:** the data subject has the right to obtain from the Data Controller confirmation that personal data processing is being processed and, in this case, to obtain access to personal data and information art. 15, in particular: purpose of the processing, categories of personal data, categories of recipients, to which the data have been or will be communicated, the retention period of the data or the criteria used to determine this period, the origin of the data, the existence of an automated process, including profiling;
- b) **Right of rectification:** the interested party has the right, pursuant to art. 16, to obtain from the Data Controller the

- correction and/or integration of inaccurate personal data concerning him, without unjustified delay;
- c) **Right of cancellation:** the data subject has the right to obtain from the Data Controller the deletion of personal data concerning him/her without undue delay for the reasons set forth in art. 17;
  - d) **Right to limit processing:** the data subject has the right to obtain from the Data Controller the limitation of processing in the cases referred to in art. 18;
  - e) **Data portability right:** the interested party has the right, pursuant to art. 20, to receive personal data concerning him in a structured format, commonly used and readable by automatic device.

The interested party may also exercise the **Right to object**. Pursuant to art. 21, the interested party has the right to object to the processing of data concerning him for the purposes referred to in art. 6, paragraph and letters e) (processing is necessary for the performance of a task carried out in the public interest or in connection with the exercise of official authority vested in the data controller) or f) (the processing is necessary for the pursuit of legitimate interest of the data controller or third parties, provided that the interests or the fundamental rights and freedoms of the data subject who request the protection of personal data do not prevail).

The interested party may exercise these rights at any time in an easy manner, by sending a specific request to the Data Controller, to the e-mail address [sales@icmasg.it](mailto:sales@icmasg.it), who will inform him of the receipt and will proceed to his request without undue delay and, however, within one month of receiving the request.

Pursuant to art. 19, any requests relating to adjustments or cancellations or limitations of processing will be transmitted by the Data Controller to each of the recipients to whom the personal data have been transmitted, unless this proves impossible or involves a disproportionate effort.

#### **Right to file a complaint with a supervisory authority**

The interested party also has the right to lodge a complaint with the competent supervisory authority (Guarantor for the Protection of Personal Data <http://www.garanteprivacy.it>).

#### **Necessity and Consequences of a refusal to communicate personal data**

The communication of personal data is essential for the conclusion of the supply contract. The failure to communicate data, for the purposes indicated, will prevent the Data Controller from following up the contract.

The communication to third parties of some data is functional to the performance, the organization of the Data Controller or is necessary for the purposes of the law.

For all the definitions, refer to the binding legislation with particular reference to the European Regulation 679/2016 and to the Legislative Decree 196/2003 and subsequent amendments.

We will notify our suppliers about any changes to the information provided in this statement.  
All updated information can be viewed on our website [www.icmasg.it](http://www.icmasg.it).

Icma San Giorgio Spa