

PRIVACY STATEMENT for the processing of personal data Art.13. REGULATION (EU) 2016/679
 (Data Protection Statement – Customers/Suppliers – INF. 1 – Rev.03 of 09/03/2020)

Data Controller: **Stiferite S.p.A.** – Via della Navigazione Interna, 54 int. 5 – 35129 Padova (PD)/IT

RE: Privacy Statement pursuant to and in accordance with Articles 7, 8, 9, 12, **13**, 14 and 15-22 of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

1. PROCESSING (how we process Your personal data)

Stiferite S.p.A., or Data Controller, in the person of its Legal Representative, informs you that, in order to ensure the effective management of the contractual relationship, it may process the CUSTOMER's and the SUPPLIER's data (also known as the "data subject", understood as the individual who requested a quote or a service from the Data Controller, or is entering or has previously entered into a contract with the Data Controller or, in any case, has requested to enter into a contract), pursuant to Regulation (EU) 2016/679, Legislative Decree 196/2003 as further amended and extended as well as any related regulations, for the purposes outlined below.

PURPOSE (why)	LEGAL BASIS (on which grounds)	CONSEQUENCES OF YOUR REFUSAL TO PROVIDE DATA	DURATION OF THE PROCESSING (for how long)
Entering into and conducting the contractual and pre-contractual relationship (including any request for quotes and services), with its administrative and accounting purposes and the relevant communication to the Controller's customer	Performance of the contract	Without your data it will not be possible to enter into or perform the contract and fulfil the requirements of the data subject	Up to 12 months after the termination of the contractual relationship or of the pre-contractual requirements
Fulfilment of legal or regulatory requirements, for administrative and accounting purposes relating to the performance of the contract	Regulatory requirement	Without this, the penalties provided for in the applicable legislation shall apply	For the duration provided for in the applicable legislation
Applying to the court to ascertain, exercise or defend a right	The Data Controller's legitimate interest, which shall be deemed to take precedence pursuant to Recital 21 of the GDPR for the legitimate legal protection of its own rights	Without your data it will not be possible to enter into or perform the contract and fulfil the requirements of the data subject	For the duration of the rights in judicial proceedings, 10 years in matters of civil law
Fraud prevention and protection of communication networks or computer systems	The Data Controller's legitimate interest, which shall be deemed to take	Without your data it will not be possible to enter into or perform the contract and fulfil the requirements of the data	For the duration of the rights in judicial proceedings, 10 years in matters of civil law



(when the Customer has access to the Data Controller's systems or networks)	precedence pursuant to Recital 47 and 49 of the GDPR for the protection of the data controller's activities (including its internet security)	subject	
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Personal Data: Managing PERSONAL DATA includes the processing of your data on our part, or data of a personal nature as well as certain categories of data that you have provided to us. With regard to such processing the Data Controller can obtain data that Legislative Decree 196/03 and Regulation (EU) 2016/679 defines as “categories of personal data including specific data” such as those elements that define the data subject’s physical, economic, cultural or social identity including data defined as “sensitive”, for example, that provide information about the physical health of the data subject and of the natural persons connected with the services provided by the Data Controller and more specifically: *a) data relating to the reporting lines of your employees, co-workers and associates, b) the health condition of your employees, co-workers and associates relating to information resulting from the application of Legislative Decree 81/08 as further amended and extended, c) the criminal records of natural and legal persons.*

The way data are processed: data shall be processed in hard copy or electronic form or other means of communication in order to ensure the security and confidentiality of the data as well as full compliance with the legislation. Data processing will be carried out by automated means that do not generate the profiling of the data subjects.

2. RECIPIENTS, COMMUNICATION AND DISCLOSURE (who we share your data with, whether and how we publish your data)

Your data shall not be disclosed and may be communicated to external authorised recipients or independent data controllers or co-owners, in particular those belonging to the following categories:

accountants, data processing centres and/or contractors external to our organisation but closely connected to it for operational purposes;
credit and/or financial institutions, those responsible for transport and/or delivery services; those responsible for managing the correspondence between us;
tax consultants, the company’s legal representative, and those responsible for debt collection;
the government, public and private bodies, including after inspections or checks or for the purpose of performing the obligations required by law or by other mandatory regulations, EU Legislation or secondary law (such as: Financial Administrations, the tax and customs authorities, legal authorities, etc.);
those who may access your data in accordance with legal provisions or secondary and EU regulations;
other entities, external to our organisation, which carry out activities related to the service provided.

Entities belonging to the above-mentioned categories shall use the data in their capacity as independent data controllers, external data processors or co-owners, depending on the situation, pursuant to Regulation (EU) 2016/679 and the applicable national legislation, external to the processing originally carried out in our company; or in some cases, in their capacity as external processors if duly appointed for said purpose. The list of names of those who have obtained or will obtain your data is available in the contracts held by the Data Controller.

For the purposes indicated in this privacy statement, personal data may be sent to countries of the European Union.

Third-party data: If the Customer is a natural person, the provisions laid down herein on personal data shall apply. If the Customer is a legal entity, the processing of personal data does not need to comply with the relevant legislation except for marketing purposes. However, any employees/contractors who are natural persons may (directly or in the name and on behalf of the Customer) provide personal data for the performance of the contract. In this case the Customer must ensure that the natural persons (such as the Customer's employees, contractors, customers, suppliers and consultants) have been made aware of the Controller's privacy statement, by providing them with a hard copy or by indicating where it can be accessed, and by obtaining the consent (if required) of the data subject, exempting the Data Controller of any responsibility or third-party claim on the matter.

3. YOUR RIGHTS (such as the requests you can make in order to exercise your rights regarding the processing)

Finally, we hereby inform you that you may exercise the following rights at any time:

You have the right to ask the Data Controller for access to your personal data by asking whether or not he/she holds your personal information, as well as to ask him/her to rectify or delete the data or restrict (temporarily) the use of any of your data.
You have the right to object to the processing of your personal data at any time in specific circumstances such as: I) the processing required for the performance of a task carried out in the public interest or connected with the exercise of powers by the authorities; II) in order to pursue the legitimate interest of the data controller.
If you gave your consent for one or more specific purposes, you have the right to withdraw your consent at any time.
You have the right to data portability (data with a legal basis for contractual or consensual commitments) by asking the controller, by means of a .csv .xml or similar file.

4. COMPLAINT TO THE SUPERVISORY AUTHORITY (who to contact externally in the event of negligence on our part)

You have the right to complain to the following Supervisory Authority: Data protection authority (<http://www.garanteprivacy.it>); you also have the right to make a complaint to the competent authority of the member state where you normally reside, work or the place where the breach took place.

5. DATA CONTROLLER

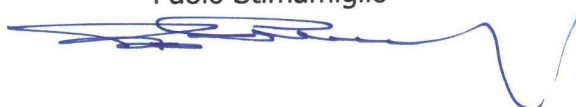
Data Controller **Stiferite SpA** – Via della Navigazione Interna, 54 int. 5 – 35129 Padova (PD) - e.mail: privacy@stiferite.com.

The entire content of Articles, 8, 9, 12, 13, 14 and 15-22 of Regulation (EU) 2016/679 of Legislative Decree 196/03 reviewed by Legislative Decree 101/18 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, is available from our office and on our website www.garanteprivacy.it

Padova (PD), 09/03/2020

the Data Controller
STIFERITE S.p.A.

Paolo Stimamiglio



GLOSSARY

Supervisory Authority: The Supervisory Authority (the Data Protection Authority in Italy) is the independent administrative authority established by the legislation on privacy. The Authority reviews the complaints of data subjects and monitors compliance with the regulations that protect privacy. It decides on complaints made and forbids, ex officio, any unlawful or irregular processing. It carries out inspections, imposes administrative penalties and gives legal advice on cases provided for by the law.

Authorised person: The employee or contractor who, on behalf of the Data Controller's organisation, will process or use personal data based on instructions received by the data controller.

Communication: To communicate in any form personal data to one or more data subjects (other than the data subject, the data controller or the authorised person), including by making the data available or accessible (see also disclosure).

Consent: The freely given consent of the data subject to expressly accept the specific processing of personal data, about which the data subject was previously informed by the person who determines the nature of the processing.

Personal data: Any information regarding the natural persons that are or may be identified including by means of other information, for example, through an identity number or code. Personal data are, for example, the name, surname or title; the address, tax code but also an image, voice recording of a person, fingerprint, medical information, bank details, etc.

Disclosure: Disclosure of personal data to the public or, in any case, to an unspecified number of data subjects (for example, disclosure is the publication of personal data in a newspaper or on a web page).

Privacy Statement: The information that the Data Controller must provide to each data subject, verbally or in writing when the data are collected from the data subject or from third parties. The privacy statement must clarify what the purposes of the processing are; whether the data subject is bound to provide data or not; what the consequences are if data are not provided; who they should be communicated or disclosed to; which rights are recognised to the data subject; who the data controller and co-owner are and where they can be contacted (address, telephone, fax, etc.).

Data subject: The natural person whom the personal data refers to.

Security measures: These are all the technical and organisational means, electronic devices or I.T. programmes used to ensure data are not destroyed or lost, even by accident, to ensure that only those who have been authorised to have access to the data and that processing shall be carried out according to the legislation and only for the purposes for which data were collected.

Data Controller: The natural person, company, entity, association, etc. specifically responsible for the data processing and who must make fundamental decisions about the purposes of the processing and how it is carried out (including security measures). In the event that the processing is carried out by a company or a public body on, it is understood that the data controller is the overall entity and not an individual or an organisation which manages or represents it (chairman, managing director, mayor, minister, general manager, etc.). The instances in which the processing can be attributed to an individual relate to self-employed people or individual companies.

Processing (of personal data): An operation or set of operations that relate to personal data. The definition includes the collection, registration, organisation, storage, modification, selection, extraction, use, block, communication, disclosure, deletion, and destruction of data. Each of these operations is a form of data processing.