

## E) INFORMATIVE STATEMENT ON PROCESSING THE PERSONAL DATA OF SUPPLIERS

### INFORMATION ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ART. 13 OF EUROPEAN REGULATION 679/2016

Dear Sir/Madam,

We need to process information concerning you, your personal data, for the preparation and performance of the supply contract to which you are a party, or act as the supplier's representative, or participate as a service provider; to this end, as required by the European regulation for the protection of personal data (European Regulation 679/2016), we provide you with the following information.

#### **1. Controller**

The Controller, or the party responsible for the decisions regarding the purposes, modalities and security of personal data, is Sintagma S.r.l., with registered office in 06132 San Martino in Campo (PG), Via Roberta, 1, VAT number 01701070540, in the person of the legal representative *pro tempore*.

#### **2. Purposes and legal grounds for processing**

The personal data that you will provide us and that will be collected during the supplying of the services provided for in the supply contract will be processed for the purposes and according to the legal grounds indicated below:

<b>PURPOSES</b> <i>(Why we process your data)</i>	<b>LEGAL GROUNDS</b> <i>(On the basis of which legal provision we process your data)</i>	<b>CONSEQUENCES OF REFUSAL OF PROCESSING</b> <i>(What happens if you refuse to provide your personal data and/or to authorize the processing of them)</i>
Fulfillment of the contract to which you are a party, or in which you represent the legal person that is a party to it, or in which you participate as a supplier.	Art. 6(1) point b, GDPR, the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.	Consent is not necessary; however, if you refuse to provide the personal data, the contract cannot be performed.
For legal obligations related to the participation in public procedures by the Company, limited to the data of the persons directly involved in the order.	Art. 6(1) point c, GDPR (processing is necessary for compliance with a legal obligation to which the controller is subject).	Consent is not required; if you refuse to provide the data it will not be possible to proceed with the work relationship.
Fulfillment of legal accounting and tax obligations related to the aforementioned contract.	Art. 6(1) point c, GDPR - processing is necessary for compliance with a legal obligation to which the controller is subject.	Consent is not necessary; however, if you refuse to provide the personal data, the contract cannot be performed.
Assert or defend a right in court (breach of contract, notices, transactions, debt collection, arbitration, legal disputes).	Art. 6(1) point f, GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party,	Consent is not necessary; however, if you refuse to provide the data, we will not be able to perform the contract.

	except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.	
To respond to requests from judicial authorities.	Art. 6(1) point c, GDPR (processing is necessary for compliance with a legal obligation to which the controller is subject).	Consent is not required, but if you refuse to provide the data, the contract cannot be performed.

### **3. Recipients and categories of data processed**

The personal data provided by you or acquired during the course of the service will be processed exclusively by personnel authorized for this purpose or by processors designated for this purpose.

In addition to the persons or bodies to whom the data must mandatorily be disclosed by law, your data may be disclosed exclusively to:

<b>PURPOSES</b>	<b>CATEGORIES OF DATA</b>	<b>RECIPIENTS</b>
Accounting, administrative and tax obligations. Legal and statutory obligations.	Identification of representatives or contract contact persons.	Professionals and/or companies that do accounting/tax data processing.
Protection in case of breach of contract	Identification, economic data, data relating to the contract	Companies and professionals in charge of possible litigation
To ensure the functioning of the company IT system	Identification data and data relating to the contract in the company IT system	Companies in charge of the management, assistance and maintenance of the IT network and of company electronic, IT and/or telematic equipment
For legal obligations related to the participation in public procedures by the Company, limited to the data of the persons directly involved in the order.	Identification, personal and professional data	Commissioning bodies, Public Control Authorities (i.e. ANAC)

### **4. Transfer to third countries**

Your personal data will be transferred outside the European Union only if the transfer of your data is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request; the legal ground is Art. 49(1) point b, GDPR.

### **5. Period for which the personal data will be stored and criteria used**

The personal data being processed are collected in documents the storage of which is established consistently with the purposes of the processing as summarized below.

<b>DOCUMENT</b>	<b>DURATION OF THE STORAGE</b>
Contract documentation	Ten years from the termination of the contract relationship except for legitimate causes for suspension.

Administrative, accounting, tax documentation	Ten years from the termination of the contract relationship except for legitimate causes for suspension.
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## **6. Rights of the data subject**

The Regulation recognizes the following rights that you may exercise in respect of and against each joint controller.

A complete extract of the following articles of law is available on the Internet at:

<http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/6264597>.

- Right of access: Art. 15 of the European Regulation allows you to obtain from the controller confirmation as to whether or not personal data concerning you are being processed
- Right to rectification: Art. 16 of the European Regulation allows you to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, the data subject has the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- Right to erasure: Art. 17 of the European Regulation allows you to obtain from the controller the erasure of personal data concerning you without undue delay if there is one of the grounds provided for by the Regulation.
- Right to restriction: Art. 18 of the European Regulation allows you to obtain from the controller restriction of processing where one of the cases provided for by the Regulation applies.
- Right to object: Art. 21 of the European Regulation allows you to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions.
- Right to data portability: Art. 20 of the European Regulation allows you to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format, and you have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, according to the conditions foreseen by the Regulation.
- Right to withdraw consent: Art. 7 of the European Regulation allows you to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- Right to lodge a complaint: Art. 77 of the European Regulation gives you the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data relating to you infringes this Regulation.

## **7. Further information**

More information, our privacy policy, and this information are available on our website at [www.sintagma-ingegneria.it](http://www.sintagma-ingegneria.it).

A complete extract of the aforementioned articles of law is available at the company's Privacy Office at Via Roberta, 1, 06132 San Martino in Campo (PG).

This office will be able to provide you with all the explanations you may need regarding the exercising of your rights. Requests can be sent in writing, accompanied by a valid identification document, at the controller's office as indicated above.

#### **8. Cooperation**

The protection of data concerning you and compliance with the principles established by the regulation, especially with regard to the principle of transparency, are values of primary importance for us. We will be grateful if you could help us by informing us of any misunderstandings of this document or suggesting improvements to us at the controller's contacts as indicated above.

*Perugia, June 30, 2021*