

PERSONAL DATA PROCESSING POLICY

Applicable subjects: Suppliers and potential suppliers (companies and individual consultants)

DRASS GALEAZZI SRLU, with registered office in Via Teresa Mattei 4, 57121 Livorno, Tel 0586.421.221, as the **Data Controller** of your personal data, pursuant to and for the purposes of Legislative Decree 196/03 ('Code on the subject for the protection of personal data '), of Regulation (EU) 2016/679 (also GDPR) and of Legislative Decree 101/18, hereby informs you that the aforementioned legislation provides for the protection of people and other subjects with respect to processing of personal data and that this treatment will be based on principles of correctness, lawfulness, transparency and protection of your privacy and your rights.

Your personal data will be processed in accordance with the legislative provisions of the aforementioned legislation and the confidentiality obligations set forth therein.

Purpose of Use: in particular, your data will be processed for purposes related to the implementation of the following requirements, relating to legislative or contractual obligations:

- Mandatory statutory requirements for tax and accounting;
- Any after-sales activities;
- Litigation management;
- Management of business and organizational relations with the supplier;
- Task scheduling;
- Billing history;
- Telepresence of tests and meetings with possible recording of them.

The processing of functional data for the fulfilment of these obligations is necessary for the proper management of the report and their delivery is mandatory to implement the above objectives. The Data Controller also discloses that any non-communication, or miscommunication, of any of the mandatory information may cause the Data Controller to be unable to guarantee the adequacy of the treatment.

For the purposes of the above processing, the Data Controller may become aware of data defined as common and particular, i.e. sensitive and judicial under the Privacy Code, and in particular:

- Email address;
- Phone number;
- Personal and billing data;
- Information on legal proceedings.

Your sensitive data that is processed is only that which is strictly relevant to the obligations, tasks or purposes described above and will be treated in accordance with the information contained in the relevant General Authorizations of the Guarantor.

Your personal data may also be used for the following purposes, subject to your consent (required at the time of their collection):

- Sharing personal data, photos and/or videos on the Company's website or other advertising material.

The provision of the data is optional for you with regard to the above purposes, and any refusal to comply with the treatment does not compromise the continuation of the relationship or the adequacy of the treatment itself, except that it is impossible to better serve the customer. This data is functional to the optimization of the administrative, commercial relationship and the possible sending of promotional material. It should be specified that most of the treatment carried out is not subject to the obligation to acquire consent under article 24 of Legislative Decree 196/2003 and article 7 of the GDPR.

It should also be noted that photographs or videos will be acquired during courses, fairs or events organized by the Data Controller only after requesting verbal consent. The employees in charge will make sure to exclude from the recorded images those who have expressly denied consent, possibly documented on the appropriate form.

Processing Methods: your personal data may be processed in the following ways:

- Entrusting processing operations or legal provisions to third parties;
- Creating profiles for internal use, related to suppliers or collaborators;
- Treatment by means of electronic devices;
- Manual treatment by means of paper archives.

Each treatment takes place in accordance with the methods referred to in Chapter II of the Regulation (EU) 2016/679 and articles 11, 31 and following of the Legislative Decrees 196/03.

Communication: your data will be stored at our headquarters and will be communicated exclusively to those responsible for the performance of the services necessary to the proper management of the report, with a guarantee of protection of the rights of the person concerned.

Your data will be processed only by personnel expressly authorized by the Data Controller and, in particular, by the following categories of persons in charge:

- Administrative and HR managers and staff;
- IT managers and staff;
- Quality and Safety managers and staff;
- Sales and Marketing managers and agents
- Other employees within the limits of the assignments received and as required by the company procedures.

Your data may be communicated to third parties, in particular to:

- Freight Forwarders, Transporters, Post Offices, Logistics Companies;
- Sales agents;
- Consultants and freelancers, also in associated form;
- Banks and credit institutions;
- Entities that manage the delivery service of ordinary and commercial correspondence;
- to other subjects (companies and consultants appointed for this purpose responsible) who provide services for purposes auxiliary to the relationship between you and DRASS within the limits strictly necessary to carry out the tasks such as: tax compliance, accounting, management of information systems, financial services, recovery credits. other entities (responsible companies and consultants) who provide services for auxiliary purposes to the relationship between you and DRASS within the limits strictly necessary to carry out tasks such as: tax obligations, accountants, information systems management, financial services, debt collection.

Disclosure: the data, while the absolute prohibition on the dissemination of data suitable to reveal the state of health, may be disseminated at:

- Publication on the internet or advertising material (personal data and possible photography/video).

Storage: Your personal data will be stored in the manner indicated above, for the minimum time provided by the legislative and contractual nature. At the time of the termination of the contractual relationship between you and DRASS, the data will be stored for 10 years on the company management systems and/or in the paper archives. At the time of deletion, it is possible that the data may still be retained but anonymized.

You have the right to obtain from the Data Controller the deletion, communication, updating, adjustment, integration of your personal data concerning, and in general you may exercise all rights under Article 7 of the Privacy Code and by the GDPR Chapter III, Article 12 to 23, including the right to file a complaint with the supervisory authority.