

PRIVACY NOTICE TO SUPPLIERS AND BUSINESS PARTNERS

(pursuant to article 13-14 of the EU Regulation 2016/679 on personal data protection)

AL.Pi S.r.l. in its capacity as Data Controller, is hereby informing you that Regulation (EU) 2016/679 (GDPR) now regulates the protection of personal information. Forsteel bases its data processing on the principles of correctness, lawfulness, transparency and necessity, as provided for by the aforementioned Regulation. Therefore, we are now providing you with the following information pursuant to Article 13 of the GDPR.

1. Identity and contact details of the Controller

The Data Controller is AL.Pi S.r.l., with registered office in Morrovalle (MC), Via Sansovino n.42, Vat number 01344260433, represented by its Legal Representative for the time being.

Tel. +390733/898030

E-mail: info@alpisoles.com

2. Types of personal data

The Data Controller will process the personal data:

- of the Supplier, if it is a natural person: identifying data (name, surname, etc.), contact details, tax and banking data; if presentations are delivered via teleconference, and these are recorded, audio-visual recordings will also be collected.
- of Data Subjects: only data collected in relation to the existing contractual/pre-contractual relationship and which are necessary for the negotiation, execution and performance thereof, such as identifying data and contact data for business use (e.g. mobile phone number, e-mail address, other contact details as contact person of the contractual relationship); if presentations are delivered via teleconference, and these are recorded, audio-visual recordings will also be processed.

3. Purpose, legal basis and optionality of the processing

Personal data will only be processed for purposes related to the assessment, negotiation, execution and performance of the contractual or pre-contractual relationship, to fulfil specific legal obligations or to defend a right in court.

The legal bases for the abovementioned purposes are respectively Articles 6(1)(b), 6(1)(c) and 6(1)(f) of the Regulation.

4. Disclosure of personal data – categories of recipients

Aside from the employees and various partners of the data controller (who have been authorised by the data controller to process data based on adequate written operational instructions, in order to guarantee the confidentiality and security of the data), certain processing operations may also be carried out by third parties, to whom/which the data controller entrusts certain activities or part thereof, i.e. in fulfilment of both contractual and legal obligations.

We communicate your data just to those entities we use for activities whose purpose is described in the previous paragraph, such as:

- Accountants
- Companies that make for us activities of technical coordination, assistance and maintenance of computer systems
- Lawyers
- Security and Health advisors

We personally appoint subjects above-mentioned who are responsible for the treatment.

We could also communicate your data to those subjects we interface because of legal obligation and to those banks we work together for the contract conclusion. These subjects carry out their own activities of treatment as independent holder.

5. Retention of personal data

The data shall be stored in compliance with the applicable regulations on protection of personal data for the time that is necessary to comply with the above mentioned purposes, in accordance with the principle of data minimisation referred to in Article 5(1)(c) of the Regulation. In particular, personal data will be stored by Company for the whole duration of the contractual relationship and also after its termination, in compliance with applicable laws (including, without limitation, the obligation to keep the invoices and other company documents for at least 10 years).

6. Rights of Data Subjects

A Data Subject shall have the rights contemplated in the Regulation (articles from 15-21) in respect of the processing of data contemplated thereto, including the right to:

- Obtain confirmation of the existence of personal data concerning him/her and to gain access to them (right of access);
- Obtain the updating, modification and/or rectification of its personal data (right of rectification);
- Obtain erasure, or to set limits to processing, of personal data whose processing is unlawful, including those that are no longer necessary in relation to the purposes for which they were collected or otherwise processed (right to be forgotten and right to the restriction of processing);
- Object to processing (right to object);
- Withdraw previously given consent, if any, without prejudice to the lawfulness of processing based on that consent;
- Receive a copy in electronic form of the data concerning him or her which have been provided to a controller in the framework of an agreement and to have such data transmitted to another controller (right to data portability).

For the exercise of the rights above and in case of further requests for information regarding the present privacy notice, the Data Subject can contact the Data Controller by sending an email or by a registered letter to the legal address of the Company.

Data Subject may also lodge a complaint with the Supervisory Authority in case of infringement of regulations concerning the protection of personal data.

7. Provision of Data

The provision of personal data for the purposes indicated above is optional. However, if personal data are not provided, it will not be possible to establish a contractual or pre-contractual relationship with the Data Controller.