

F.lli GANDOSSI Acciaierie Elettriche S.p.A.



Sede e stabil.: 24027 **NEMBRO** (BG)- Via Roma, 23 Tel. 035 4127003 – Fax. 035 523557 – E-mail: info@gandossifonderie.it

Capitale interamente versato Euro 154.800,00

Reg. Imprese Bergamo – Cod. Fiscale e n. iscriz. 00209840164

Partita IVA n.: IT00209840164 - R.E.A. di BG n. 53294 - Meccan. BG 005802

INFORMATION TO CUSTOMERS AND SUPPLIERS FOR THE PROCESSING OF PERSONAL DATA

Pursuant to Legislative Decree n. 196/2003 and to the EU Regulation no. 679/2016 (GDPR) and in relation to your personal data that will be processed, we inform you of the following

1. PERSONAL DATA PROCESSED, PURPOSE OF THE TREATMENT, LEGAL BASIS OF TREATMENT AND RETENTION PERIOD

"Data" means those relating to natural persons treated by F.LLI GANDOSSI ACCIAIERIE ELETTRICHE S.P.A. for the stipulation and execution of the contractual relationship with its customers / suppliers, such as those of the legal representative of the customer / supplier who signs the contract in the name and on behalf of the latter, of the customer / supplier employees / consultants involved in the activities referred to in the contract, the Data of the companies of the customer / supplier group for which the latter signs the contract with the necessary powers of representation, as well as any other information necessary for the execution of the contract and / or the supply of the service (s) (also indicated below).

In particular, such Data will be processed for the purposes indicated below.

A. <u>Management of the contractual / commercial relationship,</u> such as: meeting specific requests of the interested party before the conclusion of the contract; conclusion, modifications, execution of the contract; provision and management of related services; claims management.

The legal bases of treatment are:

- Execution of the contract for the Data of the legal representative of the supplier / customer
- Legitimate interest on the data of the employees / consultants of the supplier / customer involved in the activities referred to in the contract.

Data retention period: contract duration and, after termination, for a further 10 years. In the case of judicial litigation, for the entire duration of the same, until the exhaustion of the time limits for the appeal proceedings.

B. <u>Administrative - accounting,</u> such as: invoicing; management of payments, delays and missed payments; communication of the same Data between group companies, for organizational, administrative, financial and internal accounting purposes functional to the aforementioned activities.

<u>The legal basis</u> of the processing is the need to fulfill a legal obligation to which F.LLI GANDOSSI ACCIAIERIE S.P.A. is subject.

<u>Data retention period</u>: contract duration and, after termination, for a further 10 years. In the case of judicial litigation, for its entire duration, until the exhaustion of the terms of practicability of the appeals.

C. <u>Fulfillment of obligations or exercise of rights</u> under national or European Union law or collective agreements in accordance with national law, such as: fulfillment of obligations under EU and national laws, in particular by laws, regulations, including contingent and urgent measures for the protection of public order, the verification and repression of crimes.

The <u>legal basis of the processing</u> is the need to fulfill a legal obligation to which the data controller is subject.

<u>Data retention period</u>: contract duration and, after termination, for a further 10 years. In the case of judicial litigation, for the entire duration of the same, until the exhaustion of the terms of practicability of the appeals.



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D. Extrajudicial credit recovery (in the case of customers), such as: protection and possible recovery of credit, directly or through third parties (credit recovery agencies / companies) to which they will only be communicated for this purpose.

The legal basis for processing is legitimate interest.

<u>Data retention period</u>: contract duration and, after termination, for a further 10 years. In the case of judicial litigation, for the entire duration of the same, until exhaustion of the time limits for the appeal proceedings.

E. If necessary, to ascertain, exercise and / or defend rights in court.

The <u>legal basis for processing</u> is legitimate interest.

Data retention period: contract duration and, after termination, for a further 10 years. In the case of judicial litigation, for the entire duration of the same, until the exhaustion of the terms of practicability of the appeals.

F. Security, pursuant to Legislative Decree. 81/2008. With particular reference to the identification data freely given by the visitor / visitor to our offices (name, surname, institution or company of belonging), the treatment has the exclusive purpose of ensuring compliance with the corporate security procedures formally applied, even in force of the regulations in force (eg annotation in the register / visitor database, assignment of temporary identification badge, applications of legal obligations in the field of safety at work).

The legal basis of the processing: need to fulfill legal obligations to which the holder is subject.

<u>Data Retention Period</u>: Data will be retained for the period of time required by law. Once the above storage terms have elapsed, the Data will be destroyed or made anonymous, consistent with the technical cancellation and backup procedures.

2. DATA COLLECTED FROM THIRD PARTIES

We hereby inform you that the personal data object of the processing, in particular in relation to the purposes referred to in point 1, lett. A, may be acquired not by the data subject itself but by third parties, by accessing public databases or through the use of dedicated inspection services.

3. METHOD OF DATA PROCESSING

The processing of personal data may be carried out with the aid of both analogical and electronic or automated means, with procedures strictly necessary for the pursuit of the purposes described above.

4. DATA COMMUNICATION, SUBJECTS AUTHORIZED FOR TREATMENT

Data may be communicated to external subjects operating as data controllers, by way of example, authorities and supervisory and control bodies and in general public or private entities, entitled to request data (eg banks and credit institutions; administrations and other public authorities).

Data may be processed, on behalf of the Data Controller, by external parties designated as Data Processors, who perform specific activities on behalf of the owner, for example, its distribution network, the companies and the agents carrying out the activity of debt collection for the owner, legal, tax and administrative consultants

Data may be processed by employees of the company departments responsible for the pursuit of the aforementioned purposes, who have been expressly authorized to process and who have received adequate operating instructions.



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Data will not be disseminated.

5. DATA SUPPLY

Without prejudice to the autonomy of the person concerned, the provision of personal data can be:

- a) mandatory according to law, regulation or community legislation or on the basis of instructions given by Authorities legitimated by the law or by Supervisory and Control Bodies;
- b) strictly necessary for the conclusion of new relationships between the customer/supplier and F.LLI GANDOSSI ACCIAIERIE ELETTRICHE S.P.A. or for the management and execution of existing relationships.

Any opposition to the processing of data and / or refusal by the interested party to provide personal data may result in the inability to conclude new contracts with you or to implement those already in place.

6. DATA CONTROLLER AND DATA PROCESSORS

F.LLI GANDOSSI ACCIAIERIE ELETTRICHE S.P.A., C.F. e P.I. 00209840164, registered office in 24027 – Nembro (BG), Via Roma n. 23, is the Data Controller.

The updated list of the Data Processors is available at the registered office of the Data Controller.

7. RIGHTS OF THE INTERESTED PARTY

The privacy legislation (articles 12-22 of EU Regulation 679/2016) guarantees the right to be informed about the processing of data concerning you, and the right to access the data at any time and request the update, integration and correction. If the conditions provided for by the law are met, the data subject may also claim the right to cancel data, limit their processing, data portability, opposition to processing, and not be subjected to decisions based solely on automated processing.

If the processing of personal data is based on the consent of the person concerned, he / she has the right to revoke the consent given.

For the exercise of your rights, as well as for more detailed information about the subjects or categories of subjects to whom the data are communicated, you can contact the personal data protection representative at F.LLI GANDOSSI ACCIAIERIE ELETTRICHE S.P.A., e-mail box: info@gandossifonderie.it

If you believe your rights are infringed, you can protect yourself by filing a claim to the National Data Protection Authority.

8. TREATMENTS OF THIRD PARTY DATA

The customer/supplier is informed that, if it involves third parties (for example representatives, collaborators) in the execution of contracts stipulated with F.LLI GANDOSSI ACCIAIERIE ELETTRICHE S.P.A., the personal data of the latter may be processed by F.LLI GANDOSSI ACCIAIERIE ELETTRICHE S.P.A., always as the data controller, for the purposes referred to in point 1.

These treatments have the same purposes, methods and retention times of the data described in this informative; in relation to these treatments, in addition, the interested parties have the same rights identified in point 7. The customer/supplier undertakes to inform the interested parties involved about the aforementioned treatments correctly, also by submitting them this informative.

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