

Information on the processing of suppliers' personal data

Agenzia italiana per l'internazionalizzazione - Promos Italia S.c.r.l., with registered office in Via Meravigli 9/b, 20123 Milan, Taxpayer's Code and VAT No. 10322390963, in its capacity of data controller (hereinafter also "**Controller**"), hereby informs you, pursuant to EU Regulation 2016/679 ("**GDPR**") and to the current national legislation on the protection of personal data, that your data will be processed in the following ways and for the following purposes:

1. Purpose of processing

The Controller processes personal data (hereinafter, "**Personal Data**" or also "**Data**"), communicated upon drawing up and executing the contract with the Controller. In particular, the Controller processes:

- the company name, address, VAT number, name, surname, date and place of birth, taxpayer's code of the company;
- name, surname, e-mail and telephone number referring to your employees and your legal representative and then communicated by you;
- judicial data such as, for example, criminal records and anti-mafia information document in accordance with the legislation on public contracts (Article 80 of Legislative Decree 50/2016).

2. Purposes and legal bases of the processing

Your Personal Data are processed, without your prior consent, for the following purposes and legal bases:

- the execution of the contract and/or the fulfilment of pre-contractual commitments, in particular for:
 - the management of pre-contractual relations, on the occasion of your application following the publication of calls for tenders;
 - if selected, (i) for the management of contractual relations and the execution of the contract (ii) the management of collections and payments.
- the fulfilment by the Controller of legal obligations, such as:
 - compliance with the obligations provided for by laws, regulations or national and Community legislation or imposed by the competent Authorities, including the assessment of the possible reasons for exclusion under Article 80 of Legislative Decree 50/2016;
 - the filling in and processing of tax returns and the related fulfilments;
 - the accounting and fulfilments related thereto.
- the pursuit of a legitimate interest of the Data Controller, in particular:
 - the prevention and suppression of unlawful acts, the verification of solvency, anti-fraud, and anti-mafia activities as well as the protection of the rights and legitimate interests of the Data Controller and/or third parties, including in court: the interest of the Data Controller corresponds to the constitutionally guaranteed right of action (Art. 24 of the Constitution) and, as such, is socially recognised as prevailing over the interests of the involved individual.

3. Processing modalities

The processing of your Personal Data is carried out, by electronic and papery means, through the operations of collection, recording, organisation, storage, consultation, processing, amendment, selection, extraction, comparison, use, interconnection, blocking, communication, deletion, and destruction of data.

Your personal data is processed electronically and, if necessary, automatically. Your personal data is protected in such a way as to minimise the risk of destruction, loss (including accidental loss), unauthorised access/use or use incompatible with the original purpose of the collection. This is achieved by the technical and organisational security measures implemented by the Data Controller.

4. Data Storage

The Data Controller shall process Personal Data for the time necessary to fulfil the above purposes and, in any case, if selected following the call for tenders, for no longer than 10 years from the termination of the contractual relationship.

5. Provision of Data

The provision of the Data is necessary to establish and continue the pre-contractual and contractual relationship with the Controller. If the Data are not provided, the contractual relationship with the Controller cannot be established or continued.

6. Access to Data

Your Data may be made accessible for the above purposes to:

- employees and/or collaborators of the Data Controller, in their capacity of data processors and/or internal data processors and/or system administrators;
- other third parties (e.g., IT suppliers, etc.) carrying out outsourcing activities on behalf of the Data Controller, in their capacity of external data processors.

7. Communication of Data.

Your Data may be communicated, even without your consent, to supervisory bodies, law enforcement agencies or the judiciary Ministry of Finance, Inland Revenue, ministerial bodies and competent authorities, local authorities (regions, provinces, municipalities), regional and provincial tax commissions, at their express request, that will process them as independent data controllers for institutional purposes and/or by virtue of the law during investigations and controls. Your Data may also be communicated to third parties (e.g., partners, freelancers, etc.), in their capacity of independent data controllers, to carry out activities that are instrumental to the above purposes, such as, for example, the members of the tender procedure evaluation commission.

8. Transfer of Data

Your Data will not be disclosed but may be transferred to countries outside the European Union. For this purpose, in accordance with the privacy legislation, the Controller assesses the impact of data transfers and adopts, if applicable, the most appropriate guarantees (e.g., adequacy decisions or standard contractual clauses).

9. Rights of the Data Subject

The Data Controller informs you that, as a Data Subject, if the limitations provided for by law do not apply, you have the right to:

- obtain confirmation of the existence or not of your personal data, even if not yet recorded, and that such data be made available to you in an intelligible form;
- obtain an indication and, if appropriate, a copy of: a) the origin and category of your personal data; b) the logic applied in the event of processing carried out with the aid of electronic instruments; c) the purposes and methods of processing; d) the identity of the data controller and data processors; e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it, in particular if received from third countries or international organisations; e) if possible, the data storage period or the criteria used to determine this period;
- obtain, without undue delay, the updating and rectification of inaccurate data or, if there is an interest, the integration of incomplete data;
- to easily revoke the consents given at any time without hindrance, using, if possible, the same channels used to provide them;
- obtain the deletion, transformation into anonymous form or blocking of data: a) processed unlawfully; b) no longer necessary in relation to the purposes for which they were collected or subsequently processed; c) in the event of withdrawal of the consent on which the processing is based and if there is no other legal basis, d) if you have opposed the processing and there is no main legitimate reason to continue processing; e) in the event of compliance with a legal obligation; f) in the case of data relating to minors. The Data Controller may refuse erasure only in the case of: a) exercise of the right to freedom of expression and information; b) performance of a legal obligation, performance of a task carried out in the public interest or exercise of public authority; c) reasons of public health interest; d) filing in the public interest, scientific or historical research or for statistical purposes; e) exercise of a right in a court of law;
- obtain the processing restriction in the event of: a) contestation of the accuracy of personal data; b) unlawful processing by the Data Controller to prevent their deletion; c) exercise of one of your rights in a court of law; d) verification of whether the legitimate reasons of the Data Controller prevail over those of the data subject;
- receive, if the processing is carried out by automatic means, without hindrance and in a structured, commonly used and readable format, the personal data concerning you to transmit them to another data controller or - if technically feasible - to obtain direct transmission by the Data Controller to another data controller;
- to oppose, in whole or in part, for legitimate reasons, the processing of your personal data, even if pertinent to the purpose of the collection;
- to lodge a complaint with the Guarantor Authority for the Protection of Personal Data.

In the above cases, if necessary, the Data Controller shall inform the third parties, to whom your personal data are communicated, of the possible exercise of your rights, except in specific cases (e.g., when this shows to be impossible or involves the use of means that are manifestly disproportionate to the protected right).

10. How to exercise your rights

You may exercise these rights at any time:

- by sending a registered letter with notice of receipt to the Controller's address;
- by sending an e-mail or PEC- certified email - to promositaliascrl@legalmail.it.

11. Data Controller, Data Protection Officer and Data Processor

The Data Controller is **Agenzia italiana per l'internazionalizzazione – Promos Italia S.c.r.l.**, with registered office in Milan, Via Meravigli 9/b, 20123 Milan, Taxpayer's Code and VAT number 10322390963. The Data Controller has also appointed a Personal Data Protection Officer who can be contacted by sending an email to dpo@promositalia.camcom.it.

The updated list of data processors, persons in charge of processing and system administrators is kept at the Data Controller's head office.

Milan, 21st April 2021

Promos Italia S.c.r.l.