

# MARSILLI

## PRIVACY POLICY

### **PRIVACY POLICY (Suppliers)**

This policy is provided pursuant to Legislative Decree 196/2003 (as amended by Legislative Decree 101/2018, which adapted the national legislation to the GDPR - EU Regulation 2016/679) **and is issued, based on the supply relationship with Marsilli S.p.A. to the interested parties involved (employees for the supplier, collaborators, subcontractors, etc.) through the supplier himself.**

### **WHO IS THE CONTROLLER OF PERSONAL DATA PROCESSING**

Marsilli S.p.A. (hereinafter the "**Company**"), with headquarters in Italy, Castelleone (CR), Via per Ripalta Arpina 14, dedicates the utmost attention to the security and confidentiality of its customers personal data in carrying out its business activities.

The Company is the Data Controller of the personal data collected.

The list of the data processors is available at the above mentioned headquarters of the Company.

### **CONTACTS**

The contact details of the Company, as data controller, can be requested at the following e-mail address: [privacy@marsilli.it](mailto:privacy@marsilli.it)

### **WHAT PERSONAL DATA MAY BE COLLECTED**

The following categories of personal data about you may be collected.

- **Personal data** of the supplier legal person, and the employees, consultants, authorized supplier subcontractors involved in the activities referred to in the contract – information regarding name, place and date of birth, title, tax and welfare data, address, telephone number, mobile number, email address. No special (sensitive) data is processed.

### **HOW WE COLLECT PERSONAL DATA**

The Company collects and processes your personal data in the following circumstances:

- while providing service covered by the contract;
- when other companies of the Group or business partners lawfully transfer your personal data to us.

Please help us keep your personal data up-to-date, by notifying us should there be any changes.

## **FOR WHAT PURPOSES MAY PERSONAL DATA BE USED**

### **a) Establishment and execution of the contractual relationships and resulting obligations, including communications relating to services (for example to process purchase orders, manage payments)**

The Company can process your Personal Data to establish and execute possible contractual relationships, to provide requested services and to give feedback on complaints and claims for administration, accounting and commercial purposes.

The Company may furthermore process your Contact data, in particular your e-mail address, to provide you with information regarding services to be rendered.

Prerequisite to processing: fulfilment of the contractual obligations.

The provision of data is mandatory to be able to manage the contractual relationship; it would not be possible for us to proceed in lack of this data.

### **b) Verifications for the purposes of contributory and/or social solidarity**

The Company may process Personal Data with purpose of verifying for purposes of contributory and/or social solidarity.

Prerequisite to processing: fulfilment of the contractual obligations and/or legitimate interest

### **c) Legal disputes, compliance to legally binding requirements to fulfil a legal obligation**

The Company collects your Contact data to fulfil a legal obligation and/or to defend their rights in a court of law.

Prerequisite to processing: legal obligations to which the company must comply and/or legitimate interests.

## **HOW WE STORE AND PROTECT PERSONAL DATA**

The Company applies all the necessary security measures needed to improve protection and maintain security, integrity and availability of your personal data by means of an ISO/IEC 27001 certified security system.

Your Personal Data is stored on our protected servers (or on hard copies suitably archived) or on those of our suppliers or commercial partners, and is accessible and usable based on our standards and our IT security policies.

The personnel authorized to process your data in accordance with the Privacy Policy is duly trained and authorized in function of the activities to be carried out and the tasks assigned.

## **HOW LONG INFORMATION IS RETAINED**

We retain your personal data only for the time necessary to achieve the purposes for which it was collected or for any legitimate related purpose. Therefore, if personal data is processed for two different purposes, we will store the data for a period of time equivalent to the purpose with the longer term. However, your personal data will no longer be processed for the purpose whose retention period has ceased.

The access to your personal data is limited to personnel who need to process them for relevant purposes.

Personal data that is no longer necessary, or for which there is no legal requirement for storing it, is irreversibly anonymised (and in this way it can be stored) or securely destroyed.

Below are the storage times in relation to the different purposes listed above:

Fulfilment of the contractual obligations: data processed to fulfil any contractual obligation may be stored for the entire duration of the contract, and in any case no longer than the following 10 years, with the intent to verify possible outstanding matters including accounting documents.

Verifications for the purposes of contributory and/or social solidarity: data processed to fulfil any contractual obligation may be stored for the entire duration of the contract, and in any case no longer than the following 10 years.

In case of legal disputes: should it be necessary to defend ourselves or to act or submit claims against yourself or third parties, we can retain personal data that we consider reasonably necessary to process for such purposes, for the possible duration of said claim.

## **WHO MAY WE SHARE PERSONAL DATA WITH**

Your personal data can be accessed duly authorized employees as well as by external suppliers, nominated, if necessary, as responsible for the processing of personal data and who provide support in providing services.

Your data may also be transferred to companies within the Marsilli Group, including those outside the EU; in this case, the controller will verify the respect of articles 44 and 45 of the GDPR.

## **DATA PROTECTION RIGHTS AND THE RIGHT TO SUBMIT A CLAIMS**

Pursuant to the GDPR, the Company would also like to inform you that - where the conditions exist - you could exercise the following rights:

- to access your personal data;
- to copy the personal data you provided (so-called portability);
- to correct data held by the Company
- to delete any data for which there is no longer a legal prerequisite for its processing;
- to revoke your consent if the processing is based on consent or if it is directly related to a direct marketing activity;
- to restrict the way your personal data is processed, within the limits required by the legislation on the protection of personal data.
- to object to processing when provided by the applicable legislation.

The exercise of these rights is subject to a few exceptions aimed at safeguarding public interests (for example the prevention or identification of crimes) and our interests (for example maintaining professional secrecy). Should you exercise any of the above mentioned rights, it will be our duty to verify that you are entitled to exercise this right and we will provide feedback, generally, within a month.

For any complaints or claims, you have the right to contact controlling authorities.

## **CHANGES TO THIS PRIVACY POLICY**

The Data Controller reserves the right to make changes to this privacy policy at any time, giving notice to the Users on its website: [www.marsilli.com](http://www.marsilli.com).

Should changes pertain to processing whose legal basis is consent, the Data Controller, if necessary, will request User's consent again.