

PRIVACY NOTICE FOR THE PROCESSING OF PERSONAL DATA – SUPPLIERS

Dear Supplier,

This Privacy Notice is provided pursuant to Article 13 of Regulation (EU) 2016/679 (General Data Protection Regulation – hereinafter “GDPR”). Personal data provided by you will be processed by Cofle S.p.A. (the “Data Controller”) in accordance with the GDPR and, in particular, in compliance with the principles of lawfulness, fairness, transparency, and protection of confidentiality and data subject rights.

1. Data Controller

The Data Controller is Cofle S.p.A., with registered office at: Via del Ghezzo, 54 – 20056 Trezzo sull’Adda (MI), Italy
VAT number: 05086630158 and Email contact: privacy@cofle.it

2. Data Protection Officer (DPO)

The Company has not appointed a Data Protection Officer (DPO), as the conditions set out in Article 37 GDPR do not apply.

3. Categories of Personal Data collected

Within the context of relationships with suppliers, collaborators and consultants (including company representatives), the Data Controller processes personal data necessary for the management of the contractual and operational relationship. In particular, the following categories of personal data are processed:

- a) identification data (e.g. name, surname);
- b) contact details (e.g. email address, phone number);
- c) data relating to professional activity and the company (e.g. company name, role);
- d) fiscal, administrative and accounting data (e.g. tax code, VAT number, bank details);
- e) data relating to the performance of contractual services;
- f) any additional data necessary for the management of the relationship (e.g. operational contacts, organisational information).

4. Purposes of processing

Personal data will be processed for the following purpose:

- a) managing the contractual and/or professional relationship, including supplier selection, qualification and management;
- b) complying with legal, administrative, accounting and tax obligations;
- c) managing operational, organisational and logistical activities related to the services provided to the Company;
- d) protecting the rights of the Data Controller, including in judicial proceedings.

5. Nature of Data provision and legal basis

The provision of personal data is necessary for the performance of the contractual relationship and for compliance with legal obligations to which the Data Controller is subject. Failure to provide such data may prevent the establishment or continuation of the contractual relationship.

The processing of personal data is based on the following legal bases pursuant to Article 6(1)(b) – performance of a contract or pre-contractual measures; Article 6(1)(c) – compliance with a legal obligation; Article 6(1)(f) – legitimate interest of the Data Controller in managing the contractual relationship and protecting its rights, provided that such interests are not overridden by the rights and freedoms of the data subjects.

The Data Controller does not carry out automated decision-making processes, including profiling, pursuant to Article 22 GDPR.

6. Processing methods

Processing will be carried out using automated and/or manual means, with methods and tools ensuring compliance with the security measures referred to in Article 32 GDPR, by personnel authorised to process personal data under the authority of the Data Controller pursuant to Article 29 GDPR.

Appropriate technical and organisational measures are implemented to ensure the confidentiality and security of personal data and to prevent unauthorised access, disclosure, alteration or destruction.

7. Data Retention

In accordance with the principles of lawfulness, purpose limitation and data minimisation, personal data will be retained for the time necessary to manage the contractual relationship and, thereafter, for a period not exceeding 10 years, unless a longer retention period is required by law.

Personal data may be retained for a longer period where necessary for the establishment, exercise or defence of legal claims.

At the end of the retention period, personal data will be deleted or anonymised.

8. Ambito di comunicazione e diffusione

Personal data will not be publicly disclosed. However, such data may be disclosed to third parties, within the limits of the purposes described above, including:

- a) public authorities and competent bodies where required by law;
- b) consultants and professionals engaged by the Company (e.g. accountants, legal advisors);
- c) IT service providers, software providers and data hosting providers, including cloud services;
- d) banks and insurance companies;
- e) other entities providing services instrumental or ancillary to the Company's activities;
- f) companies belonging to the same corporate group, including those located in EU or non-EU countries, for administrative, organisational, production or support activities related to the contractual relationship.

Such recipients will process personal data either as Data Processors appointed pursuant to Article 28 GDPR or as independent Data Controllers, as applicable.

9. Transfer of Data Outside the EEA

The Data Controller does not systematically transfer personal data outside the European Economic Area (EEA).

However, should such transfer be necessary, including within relationships with group companies or suppliers established outside the EEA, it will be carried out in compliance with Articles 44 et seq. GDPR, by adopting appropriate safeguards (such as standard contractual clauses or adequacy decisions), where applicable.

10. Data Subject Rights

You may exercise your rights under Articles 15 to 22 GDPR at any time, including:

- a) the right to obtain confirmation as to whether or not personal data concerning you are being processed and access such data;
- b) the right to obtain information on the purposes of processing, categories of data, recipients and retention period;
- c) the right to rectification of inaccurate data or completion of incomplete data, as well as erasure or restriction of processing where applicable;
- d) the right to data portability;
- e) the right to object to processing;
- f) the right to lodge a complaint with the competent Supervisory Authority, namely the Italian Data Protection Authority (Garante per la protezione dei dati personali).

11. Additional Information

Additional information regarding the processing of personal data may be requested at any time from the Data Controller using the contact details provided above.