

**SUBJECT: Information regarding the processing of suppliers' personal data pursuant to art. 13 of EU Regulation 679/2016 and Legislative Decree n ° 196/2003 and s.m.i**

Gentle supplier,

In compliance with the art. 13 of the European Regulation on the Protection of Personal Data 679/2016 (hereinafter "GDPR"), we are to provide you with the necessary information regarding the processing of the personal data supplied by you.

### **1. Data Controller**

The data controller is JRC Reflex Italia S.r.l. (hereinafter the "Company"), in the person of its legal representative pro tempore, with registered office at Via Lago Maggiore No. 5/7, 24060 Chiuduno (BG), which can be contacted at the following e-mail address: amministrazione @jrc-reflex.com.

### **2. Categories of processed data**

According to the art. 4.1 GDPR, the personal data processed by the Data Controller for the correct execution of the contractual relationship between the supplier and the Company, has as its object the c.d. "common" personal data (by way of example, name, surname, fiscal code, VAT number, residence, domicile, place and date of birth, e-mail address or certified e-mail, telephone number or FAX), and possibly bank details, financial and insurance, to the extent that the processing of such information is necessary to comply with the obligations established by law.

### **3. Purpose of processing, legal basis and storage times**

Personal data is collected and processed for the following purposes:

- (a) Purposes related to the establishment and execution of the contractual relationship between the supplier and the Company: the legal basis is the execution of the contract (Article 6.1 letter b of the GDPR);
- (b) Implementation of administrative and accounting requirements: the legal basis is the need to fulfill a legal obligation to which the Company is subject (Article 6.1 letter c of the GDPR);
- (c) If necessary, to ascertain, exercise and / or defend the Company's rights in court; the legal basis is the legitimate interest of the Data Controller (Article 6.1 letter f of the GDPR).

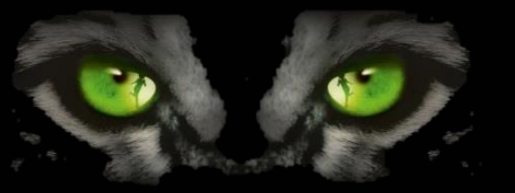
For the purposes indicated in points (a) and (b) the personal data will be kept for the contractual duration and, after the termination, for ten years; for the purpose referred to in point (c), the personal data will be kept for the entire duration of the dispute, until the terms of the possibility of appeals are exhausted.

### **4. Processing methods**

Your personal data will be processed automatically and manually, using appropriate tools and procedures to guarantee maximum security and confidentiality, by persons authorized to do so and protected from unauthorized access, in compliance with the provisions art. 32 of the GDPR.

### **5. Categories of Subjects to whom the data may be communicated**

For the pursuit of the aforementioned purposes, the Company will not disclose your personal data; however, it may need to communicate them to third parties to fulfill legal obligations or to carry out activities instrumental to the provision of the services requested. These subjects belong to the following categories:



(a) Public authorities and supervisory and control bodies when required by specific legislative, regulatory and authorization provisions;

(b) persons who carry out tasks of a technical or organizational nature on behalf of the Company; subjects that carry out accounting, tax and insurance obligations, correspondence delivery, management of receipts and payments.

The subjects belonging to the categories listed above process personal data as autonomous Data Controllers or as external Data Processors appointed by the Company. The list of External Managers is available to the interested party, who explicitly requests it from the Data Controller.

Finally, all employees who carry out their activities on the basis of the instructions received from the Data Controller, have been specifically authorized by the same, who gives appropriate operating instructions, with particular reference to the adoption of security measures, in order to guarantee the confidentiality and data security.

## 6. Rights of the interested party

Finally, we inform you that at any time you can exercise the rights provided for in articles 15 and following of the GDPR. In particular:

- obtain confirmation of the existence of personal data concerning you, even if not yet recorded and the communication in intelligible form of the same data and their origin, as well as the purposes and methods of the processing and the logic applied in the case of processing carried out with electronic tools;
- obtain the deletion, transformation into anonymous form or blocking of data for which conservation is not necessary, in relation to the purposes for which the data were collected and processed;
- obtain the updating, rectification and integration of data;
- object, in whole or in part, for legitimate reasons, to the processing of personal data concerning you, even though they are relevant to the purpose of the collection;
- object, in whole or in part, for legitimate reasons, to the processing of personal data concerning you, even though they are relevant to the purpose of the collection;
- make a complaint to the supervisory authorities;

by writing to JRC Reflex Italia Srl, Via Lago Maggiore n ° 7/7, 24060 Chiuduno (BG), or by contacting the owner at the e-mail address: [amministrazione@jrc-reflex.com](mailto:amministrazione@jrc-reflex.com).

## 7. Obligation to provide data and consequences of any refusal

We inform you that the provision of your personal data is obligatory, therefore their failure to provide it will make it impossible to establish or continue the contractual relationship between the supplier and the Company.

This document has been updated on September 2020.

Chiuduno, 9 September 2020

Il Titolare del trattamento

**JRC REFLEX ITALIA S.r.l.**