

INFORMATION TO THE SUPPLIERS ON THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH ARTICLES 13 AND 14 OF (EU) REGULATION 2016/679 (“GDPR”)

Below, IRIDEOS S.p.a. provides information concerning the processing of personal data (the “Data”) collected via the filling in of contact or credit forms on the IRIDEOS websites and portals or in paper form, containing information useful to establish contractual relationship with the suppliers of our Company.

ABOUT US

The data controller is IRIDEOS S.p.a., with registered office in Milan, Vial Bodio, 37. You can reach us at gdpr@irideos.it for matters concerning the protection of your Data.

THE DATA WE PROCESS

We process your Data, including the personal data of the legal representatives, employees and collaborators involved to establish a contractual relationship with our Company such as, for example, agreements for the supply of goods and services, procurement contracts, outsourcing agreements and similar. They include mainly:

- personal data, tax code, VAT number, address of residence and/or domicile, also by means of the collection of valid identity documents;
- phone numbers and e-mail addresses;
- bank and/or payment data (i.e. IBAN and SWIFT code);
- data relating to the degree of solvency and punctuality of payments, also acquired via the information systems of authorised companies that provide services for the management of credit risk and the prevention of fraud;
- data concerning the reputation and any judicial data of the Supplier, its administration and employees;
- “DURC”, declaration of professional competence, anti-mafia certifications in compliance with current regulations;
- call recording in customer service handling
- *Curriculum vitae* to verify the possession of the professional requirements and memberships in professional associations, if any.



PURPOSES OF PROCESSING

PURPOSE OF PROCESSING	LEGAL BASIS
<p>Establishment and execution of the contract</p> <p>Data are processed in relation with the access to the www.irideos.it website, the accreditation to the supplier portal or the submission of quotes for the possible conclusion of a supply contract.</p>	<p>Processing is necessary to perform pre-contractual activities and for the possible establishment and execution of supply contracts with our Company. A refusal to provide the Data may result in the impossibility of conducting the contractual relationship with our Company.</p>
<p>Compliance with legal obligations</p> <p>The Data collected are processed to comply with the administration, accounting and fiscal obligations our Company is subjected to, exercise the rights of defense out of court and/or in court and comply with the measures issued by the judicial authorities aimed at the prevention and suppression of offences.</p>	<p>The processing is necessary to enable our Company to comply with the legal obligations it is subjected to, exercise the rights of defense out of court and/or in court and comply with any measures issued by the judicial authorities and other supervisory authorities.</p>
<p>Payment services and verification of the degree of reliability and punctuality of payments and fraud prevention</p> <p>Data processing takes place by accessing the information systems of companies and third parties, which provide payment verification and credit risk management and fraud prevention services.</p>	<p>Processing is based on our Company's legitimate interest in collecting and disbursing payments, conducting credit checks, fraud prevention activities, and managing late and non-payment.</p> <p>You have the right to oppose this processing at any time in case of specific situations that concern you.</p>
<p>Verification of the quality's services provided to Customers and the training of call centre operators.</p> <p>Data processing is made by listening to inbound and/or outbound calls recordings.</p>	<p>The processing is based on our company's legitimate interest to check the quality of the services provided to Customers. through Customer Care and to verify the training levels of call centre employees.</p> <p>You have the right to object at any time to this processing in the event of particular situations affecting you.</p>
<p>Processing for the management of extra-judicial, judicial and regulatory litigations</p> <p>Processing is carried out to ensure the proper management of the company's judicial and regulatory litigations.</p>	<p>The processing is based on our company's legitimate interest in carrying out the management of the extra-judicial judicial regulatory litigations related to its business activities.</p> <p>You have the right to object at any time to this processing in the event of particular situations affecting you.</p>



THIRD-PARTY SUBJECTS WE CAN COMMUNICATE DATA TO

In order to execute the supply contract, comply with legal obligations and pursue our legitimate interests, we have the faculty to communicate the personal data collected to the following subject categories:

- companies and/or individuals managing our information systems for the performance of our economic activities;
- companies and/or individuals providing technical and organizational services;
- companies and/or individuals providing data entry, storage and Data management services;
- companies and/or individuals performing control, revision and certification functions of the activities carried out by our Company;
- companies and/or individuals who are assignees of the debt and debt collection companies/institutions;
- companies and/or individuals performing consulting activities for our Company;
- legal and/or individual assignees and debt collection institutes/agencies;
- our parent companies, subsidiaries and associated companies;
- judicial and independent authorities, on the basis of orders issued pursuant to the current legislation.

With the exception of the competent judicial and independent authorities, the above-mentioned subjects shall process the personal data acquired as data controllers or processors on our behalf.

HOW WE PROCESS DATA

Your Data are collected, processed and stored in a lawful manner and for the purposes indicated above, manually and using electronic and/or automated means so as to guarantee their security and confidentiality.

WHERE WE PROCESS DATA

Your Data are stored in archives located in countries within the European Union.

If necessary to pursue the purposes illustrated above, they may be transferred abroad to countries and/or organizations outside the European Union that guarantee a level of personal data protection considered suitable by the European Commission or based on other suitable guarantees such as, for example, the standard contractual clauses adopted by the European Commission or, where envisaged, with your consent.



DATA PROCESSING DURATION

Your Data will be retained in a form that enables your identification for a period of time that does not exceed that necessary for the purpose for which they were collected. Afterwards, they will be deleted or made anonymous, without prejudice to their retention to comply with the obligations that apply after the contract is terminated and to comply with the orders issued by judicial authorities and/or regulatory and supervisory bodies.

The specific time limits for the retention of the main Data processing operations is listed below:

Pre-contractual activities and possible establishment and execution of supply contracts	up to 24 months after the Data are collected or for the duration of the contractual relationship
Compliance with legal obligations	up to 10 years after the services/products cease to be provided
Administrative, accounting and fiscal purposes	up to 10 years after the services/products cease to be provided
Financial reliability and fraud prevention	for the duration of the Contract
Pursuit of a legitimate interest	for the time necessary to the pursuit of the Company legitimate interest
Call recording processing in order to verify the quality of the services and the customer care competencies.	up to 6 months after registration.



YOUR RIGHTS

In accordance with the GDPR, you have the right to:

- access your Data to obtain information concerning their existence, processing purposes, the recipients or recipient categories your Data are or will be communicated to, Data retention limit;
- ask and obtain the modification and/or adjustment of any Data you consider inaccurate and/or incomplete;
- ask and obtain the cancellation and/or restricted processing of your Data if the data or information are not necessary for the execution of the contract, the pursuit of a legitimate interest for our Company and/or the compliance with legal obligations;
- oppose at any moment the processing of your Data, including profiling, in accordance with art. 21 of the GDPR;
- ask and obtain your Data - in a structured and commonly used format readable by automatic devices - for their portability to another controller.

You may exercise said rights either directly or through a representative by sending a standard e-mail to gdpr@irideos.it.

We will comply with requests within the terms set out in art. 12, paragraph 3 of the GDPR.

Pursuant to the regulations in force, you may lodge a complaint concerning the processing of your Data to the Authority for the protection of personal data as well as bring proceedings before a court in line with articles 78 and 79 of the GDPR.

DATA PROTECTION OFFICER

We have duly appointed a Data Protection Officer, domiciled at our registered office, who can be contacted at rpd@irideos.it.

