



## **INFORMATION ON THE PROCESSING OF PERSONAL DATA OF SUPPLIERS PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) NO.679/2016 ("GDPR")**

Dear Supplier,

The Retelit Group, as identified below, provides you with information, in accordance with Articles 13 and 14 of the GDPR, regarding processing of personal data (hereinafter, the "**Data**"), of your Company (hereinafter, the "**Supplier**") and/or the natural persons acting on its behalf, which will be used and stored in compliance with the provisions of European Regulation No. 679/2016 (hereinafter, the "GDPR"), the applicable legislation on the protection of personal data and in accordance with this notice.

It is understood that it is your responsibility to inform the individuals acting on your behalf, of the processing of the Data referred to in this notice and to seek their consent where necessary.

### **1. Who we are**

The Retelit Group consists of the Holding Retelit S.p.A. and the other Companies indicated below, which, depending on the purposes pursued, may process your Data as Autonomous Data Controller or as Joint Controllers, by issue of the Joint Controller Agreement pursuant to Article 26 of the GDPR, the essential contents of which are available upon your request at the contacts below:

- **Reti Telematiche Italiane S.p.A.**, abbreviated as "**Retelit S.p.A.**," with registered office in Milan (MI), Via Pola 9, in the person of its legal representative pro tempore;
- **Retelit Digital Services S.p.A.**, with registered office in Milan (MI), Via Pola 9, in the person of its legal representative pro tempore;
- **PA ABS S.r.l.** - Partners Associates Advanced Business Solutions, with registered office Milan, Via Pola, 9, in the person of its legal representative pro tempore;
- **PA Expertise S.r.l.**, with registered office in Milan (MI), Via Pola 9, in the person of its legal representative pro tempore;
- **Brennercom S.p.A.**, with registered office in Bolzano (BZ), via Pacinotti 12, in the person of its legal representative pro tempore;
- **IRIDEOS S.p.A.**, with registered office in Milan, Viale Luigi Bodio 33/37, 20158 tax code, VAT number 09995550960;
- **IRIDEOS DATA CENTER ITALIA S.r.l.** with registered office in Milan, Viale Luigi Bodio 33/37, 20158 tax code, VAT number 11920940969;
- **Brennercom Tirol GmbH**, headquartered at Eduard-Bodem-Gasse 8 - A-6020 Innsbruck, in the person of its legal representative pro tempore, VAT no. ATU 628 358 19;

Hereinafter, disjunctly the **Controller(s)** or together the **Joint Controllers** and/or **Group Companies**.

More information on the corporate structure of the Retelit Group, as well as contact details, can be found at [www.retelit.it](http://www.retelit.it) .

For any request regarding the processing of Data, it will in any case be possible to contact the Holding Retelit, by sending

- a letter with return receipt to the registered office,



- a PEC to [retelit@pec.retelit.com](mailto:retelit@pec.retelit.com) or
- an e-mail to [privacy@retelit.it](mailto:privacy@retelit.it).

## **2. Data Protection Officer.**

The Joint Controllers, in order to facilitate the relationship between you and each Data Controller, have designated a Group Data Protection Officer (DPO), who can be contacted via

- PEC to [retelit@pec.retelit.com](mailto:retelit@pec.retelit.com) - c.a. of the Data Protection Officer (DPO);
- e-mail, [dpo@retelit.it](mailto:dpo@retelit.it).

These contact are also made available on the holding Retelit's website [www.retelit.it](http://www.retelit.it) where any updates will also be posted.

## **3. Type of Data and Mode of Processing**

In the context of the activities related to the establishment and subsequent management of the contractual relationship between you and/or with the organization for which you are a contact person, the Group Companies collect and process the following categories of Data, due to the purposes of unified and centralized management of the purchasing process:

- personal and identifying data (e.g., first name, last name, social security number, VAT number, video images);
- Contact information, such as residence or home address, e-mail address, telephone number;
- company, industry, job role, function;
- data on the degree of solvency and punctuality of payments, also acquired through information systems of authorized companies that provide services for credit risk management and fraud prevention;
- Honorability data and any judicial data related to the Supplier, its directors and employees;
- "DURC", single labor book (abbr. LUL), declaration of professional suitability, antimafia certifications, in accordance with current regulations;
- Voice recordings as part of customer care services;
- curriculum vitae to verify possession of professional requirements and any professional memberships.

The Joint Controllers collect the Data:

- at the data subject's premises, through customer care operators, and by other contact methods, such as, for example, the websites and portals in use for accreditation to the Contractors' supplier register;
- from public sources, such as freely accessible records, directories and documents (such as financial statements or chamber of commerce visas), as well as from sources such as print and/or digital newspapers, information drawn from telephone directories, websites of public agencies and supervisory and control authorities.
- Data are collected, processed and stored in a lawful manner and for the purposes indicated below, manually and with the aid of electronic and/or automated means, in such a way as to ensure their security and confidentiality.

## **4. Purpose and legal basis for processing**



Data will be collected, used and stored for the following purposes:

PURPOSE OF PROCESSING	LEGAL BASIS.
<p>Establishment and execution of the contract</p> <p>Data processing takes place through access to the web platform in use by the Group Companies, to carry out accreditation to the supplier portal or with the filling of orders for the possible conclusion of a supply contract.</p>	<p>Processing is necessary for the performance of pre-contractual activities and the eventual conclusion and execution of the supply contract. Refusal to provide the Data may result in the inability to enter into the contractual relationship with the Controller.</p>
<p>Fulfillment of legal obligations</p> <p>The Data processing is carried out for the purpose of fulfilling administrative, accounting and tax obligations to which the Group Companies are subject.</p>	<p>Processing is necessary to enable compliance with legal and/or regulatory obligations to which the Controller is subject.</p>
<p>Payment services and verification of the reliability and timeliness 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, credit risk management and fraud prevention services.</p>	<p>The processing is based on the Controllers' legitimate interest in collecting and disbursing payments, conducting <i>credit check</i>, fraud prevention activities and handling late and non-payment. You have the right to object to this processing at any time in case of special situations concerning you.</p>
<p>Verification of the quality of services rendered to users and training of call center operators.</p> <p>Data processing is done by listening to inbound and/or outbound call recordings.</p>	<p>The processing is based on the legitimate interest of the Controller to verify the quality of services rendered to users through Customer Care and to monitor the training levels of the staff in charge. You have the right to object to this processing at any time in case of special situations that concern you.</p>
<p>Processing for extrajudicial, judicial and regulatory litigation management</p> <p>Processing is carried out to ensure the proper management of business activities with regard to extrajudicial, judicial and regulatory litigation.</p>	<p>Processing is based on the legitimate interest of the Controller in carrying out the extrajudicial, judicial and regulatory litigation management activities related to the performance of its business activities.</p>

**5. Subjects we can disclose Data**

The Data may be made accessible to, brought to the attention of, and/or communicated to the following parties, who may be appointed by the Data Controllers - as appropriate - as processors, authorized persons, co-processors, or will act as independent data controllers:

- Legal persons and/or individuals who provide management services for our information systems for the operation of our business activities;



- Legal persons and/or individuals who provide services of a technical and organizational nature;
- Legal entities and/or individuals who provide data entry, storage, and management services;
- legal persons and/or individuals performing control, audit and certification functions of the activities carried out by the Joint Controllers;
- Legal persons and/or individuals who serve as consultants to the Joint Controllers;
- banking and financial institutions and other entities that provide payment services and credit risk management and fraud prevention;
- Legal persons and/or individuals assignees of the debt and debt collection companies/institutions;
- Our parent, subsidiary and associated companies;
- judicial and independent authorities under orders issued in accordance with current regulations.

In any case, the Data will not be widespread.

## 6. How long we process the Data

The Group Companies will process your Data for the time strictly necessary to achieve the purposes indicated and described in this policy.

Specifically, depending on the purpose of processing, the expected retention periods are as follows:

Pre-contractual activities and eventual conclusion and execution of supply contracts	up to 24 months after the collection of the Data or for the duration of the contractual relationship.
Fulfillment of legal obligations	Up to 10 years after the termination of the provision of services/products.
Administrative, accounting and tax purposes	Up to 10 years after the termination of the provision of services/products.
Verification of the degree of financial reliability	For the duration of the contractual relationship.
Systems activities on Controllers' resources and/or in use by End Customers (system administrators)	for at least 6 months, in accordance with the applicable regulations on system administrators.
Verification of the quality of call center services and training of employees.	For at least 6 months after acquiring the registration.

## 7. Where we process the Data

The Joint Controllers undertake to process and store the Data within the European Union.

Notwithstanding the above, in order to achieve the purposes set out in paragraph 4, the Data may be transferred to entities established in countries outside the European Economic Area, which offer the Data Holders services related to the processing activities performed (e.g., technology service providers, cloud, CRM, etc.).



Such a transfer, where applicable, will take place in compliance with the conditions set forth in the GDPR and will be regulated, depending on the recipients, through the use of the Standard Contractual Clauses adopted by the European Commission in the latest available version or - alternatively - on the basis of an adequacy decision of the Commission and/or any other instrument allowed by the relevant legislation, including verification of adherence to the certification mechanism of the "EU-U.S. *Data Privacy Framework*."

## **8. Rights that can be exercised by the data subject**

During the period in which the Data Controllers carry out the processing of your Data, you, as a data subject, may, at any time, exercise the rights provided for in Articles 15 to 22 of the GDPR:

In accordance with the GDPR, you may exercise the following rights:

- to carry out access to its Data in order to obtain information regarding their existence, the purposes of processing, the recipients or categories of recipients to whom the Data have been or will be communicated, and the period of retention of the Data;
- To request and obtain the modification and/or rectification of Data it considers inaccurate and/or incomplete;
- to request and obtain the deletion and/or limitation of the processing of your Data if it is not necessary for the performance of the contract, the pursuit of a legitimate interest of the Contractors and/or the fulfillment of legal obligations;
- object at any time, to the processing of your Data, including profiling, under the terms of Article 21 of the GDPR;
- request and obtain your Data - in a structured, commonly used, machine-readable format - for portability to another Data Controller.

You may exercise the above rights, either directly or through your proxy, by sending a simple communication to the e-mail address [privacy@retelit.it](mailto:privacy@retelit.it).

We will carry out the relevant requests within the time limits stipulated in Article 12, Paragraph 3. of the GDPR.

## **9. Right to recourse to the Guarantor**

You have the right to file a complaint with the Garante per la Protezione dei Dati Personali if you believe that your rights have been violated, in line with Articles 77 et seq. of the GDPR, in the manner indicated on the Garante's website accessible at: [www.garanteprivacy.it](http://www.garanteprivacy.it) .

## **10. Final Provisions**

The Group Companies reserve the right to amend and/or update this disclosure also on the basis of developments in applicable data protection regulations, as well as in the face of any changes in the corporate structure of the Group. The updated version of the disclosure can always be found on the holding Retelit's website at [www.retelit.it](http://www.retelit.it).