

**PRIVACY POLICY FOR SUPPLIERS' EMPLOYEES AND COLLABORATORS
PURSUANT TO PERSONAL DATA PROTECTION LEGISLATION**

(Updated on 01 October 2023)

1. Introduction

In compliance with Article 13 of Regulation EU 2016/679 on the protection of personal data (hereinafter the “GDPR”), **SINELEC S.P.A.**, with registered office at SP211 della Lomellina, 3/13 District of San Guglielmo 15057 Tortona (AL), (hereinafter the “Company” or the “Controller”) wishes to inform its suppliers or potential suppliers (hereinafter the “Supplier”/“Suppliers”) that any personal data (including information that qualifies as the personal data of Suppliers’ employees and collaborators) provided to the Company during registration and/or qualification process on Company Supplier Register, on receipt of an offer to supply products, works, services and/or professional services (hereinafter generically the “Supplies”), or when entering into and subsequently managing a contract referring to the Services, may be processed in terms and based on the methods set out below, in compliance with applicable legislation.

1.1 You are reminded that pursuant to the GDPR: (i) “controller” means the natural or legal person, responsible for the decisions regarding the purposes, personal data processing methods and the instruments used, including the security profile; (ii) “data subject” means the natural person the personal data belongs to, thus excluding legal persons.

1.2 with regard to the personal data of Suppliers’ employees and collaborators used by the Company to manage the relationship with the Supplier, the Company qualifies as the Data Controller of said data (the “Controller”).

1.3 The Controller is obliged to provide prior information on the processing to the relevant party and data subject, from whom the personal data is collected.

1.4 In the case of relations between legal persons, the privacy policy for the parties involved in the relevant processing – where the latter provides work or professional services or collaborates with the Supplier, and whose data may be communicated, known and/or processed by the Controller in executing the primary relationship – is issued by the Controller via the Supplier.

1.5 In its capacity as Data Controller, the Company via this privacy policy provides information to data subjects on the purposes and methods for processing the personal data collected, their scope of communication and dissemination, as well as the nature of their provision.

1.6 The Supplier undertakes to grant the data subject the full knowledge of this privacy policy.

2. Purposes of the personal data processing

The Company processes data subjects’ personal data for the purpose of:

i. evaluating the Supplier for the purposes of its qualification and maintenance within the Company Supplier Register;

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ii. assessing the possible establishment or proposing the establishment of contract relationship with the Supplier referring to the Supplies, also in terms of complying with the formalities stipulated from time to time by applicable legislation or the reference contracts applicable to the specific type of Supplies;

iii. utilising and managing the Supplies themselves, should a contract relationship effectively be established,

iv. for the purposes strictly related to the above.

3. Data to be processed

Identification and contact data will be processed, including other data relating to the Supplier's employees and/or collaborators and/or natural persons that cover functions and roles within the organisation of the Supplier, with whom the Company is in contact for the purposes outlined in Paragraph 2 above (Purposes of the personal data processing).

In the case of paragraph 2, point i) and point ii), legal data and the data relating to the data subject's family members may also be subject to data processing.

4. Processing methods

Personal data will be processed using electronic means and non-automated tools.

5. Scope of data communication

Data may be utilised by the staff in the Company assigned a specific role, and who have been given adequate operating instructions regarding the protection of personal data, as well as by third parties carrying out activities on behalf of the Controller; the latter act in their capacity as external processors, under the management and control of the Controller. An updated list of the data processors can be obtained by sending a request to privacy@sinelec.it.

6. Communication of data

Data may also be communicated to other companies in the group that the Company belongs to and with whom appropriate agreements are in place concerning the agreed processing purposes, for administrative - accounting purposes, to be used for the same purposes. Data may be sent to public entities for the formalities required by law, as well as to third party companies, such as banks, credit institutions and companies strictly related to debt collection; legal and business consultants, auditors; for credit recovery, administrative and contract consulting. The aforementioned third party entities shall act as independent data controllers. An updated list of the aforementioned recipients and categories of recipients can be obtained by sending a request to privacy@sinelec.it.

The personal data will not be distributed to unspecified recipients.

7. Transfer of data abroad

The relevant personal data may be transferred abroad to countries belonging to the European Union and to Third Countries. In this instance appropriate security measures will be adopted to ensure data protection and secure transfer. You can obtain additional information by writing to: privacy@sinelec.it.



8. Data Retention

The data collected for the purposes stated under point 2 shall be stored for a period of not more than 10 (ten) years from the termination of the contractual relationship, if any, or from the date the offer was received, without prejudice to the prescriptive and legal conditions and in compliance with the rights and consequent obligations.

If no contractual relationship is established with the Supplier, the data will be stored on the Company Supplier Register for a period not exceeding 3 (three) years from the qualification of the Supplier.

9. Data Controller

The Data Controller is Sinelec S.p.A., with registered office at SP 211 della Lomellina, 3/13 District of San Guglielmo 15057 Tortona (AL) – Italy, tax identification code and VAT number 07937690019.

10. Data Protection Officer

The Company has appointed a Data Protection Officer (also known as “DPO”). The DPO can be contacted via the following communication channel: dpo@sinelec.it.

11. Exercising rights

Data subjects may at any time, obtain full clarity regarding the processes we have referred to and, specifically, obtain the erasure, anonymisation and restriction of processing of data that may possibly have been processed in breach of the law, request its updating or rectification or completion, oppose its use, and exercise their other rights pursuant to the law. To this end, an email may be sent to privacy@sinelec.it.

We would like to remind you further that data subjects are also entitled to lodge a complaint with the Italian Data Protection Authority if they deem that their rights have not been respected or that they have not received a response in accordance with the law.

SINELEC S.p.A.

(the Data Controller)