



## SUPPLIER PRIVACY NOTICE

In accordance with Articles 13 and 15 of Regulation (EU) 2016/679 (hereinafter “GDPR”), we inform you that all the personal data collected by TARROS SpA (hereinafter the “Controller”) shall be processed by our Company in compliance with the above mentioned regulation.

### Main definitions and legal references

#### Personal data

Any information relating to an identified or identifiable natural person («data subject»); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

#### Data subject

The natural person to whom personal data relate;

#### Processing

Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

#### Controller

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

#### Processor

A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

#### Data Protection Officer

A natural or legal person who informs and advises the controller, monitors compliance with the GDPR, provides advice as regards the data protection impact assessment (DPIA), cooperates with the supervisory authority and acts as the contact point for the supervisory authority;

#### Third Party

A natural person who is authorized to process personal data under the direct authority of the controller or processor

#### Recipient

A natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

#### Legal references

Legislative Decree 196/2003, as subsequently amended by Legislative Decree 101/2018, and Regulation (EU) 2016/679.

#### **Controller**

TARROS Spa, Via Privata Enel, 19126 La Spezia (SP) Italy  
+39 0187 5371 Certified email: tarros@pec.it.



### Purposes, legal basis and data retention period

The personal data disclosed to the controller are necessary for:

- 1) Trade negotiations;
- 2) Implementation of trade agreements;
- 3) Video-surveillance to protect the company's assets and for safety at work;
- 4) Legal protection;
- 5) Legal obligations.

The personal data are processed for the time necessary to fulfil the aforementioned purposes.

CCTV footage is retained for 48 hours.

The personal data disclosed to the controller shall also be used for communication or marketing purposes, the data subject shall have the right to obtain the erasure of personal data concerning him or her from the controller.

The legal bases for processing pursuant to Article 6 of Regulation (EU) 2016/679 are:

- 1) as regards the personal data disclosed for trade agreements: processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures at the request of the data subject;
- 2) as regards the personal data disclosed for compliance with legal obligations: processing is necessary for compliance with any legal obligation to which the controller is subject;
- 3) as regards the personal data of the supplier and third parties processed for communication purposes in situations of accidents, natural disasters, adversities: processing is necessary in order to protect the vital interests of the data subject or of any other natural person;
- 4) as regards any other purpose: the consent.

### Recipients

We inform you that the personal data disclosed to the controller shall not be transferred to third parties but may be transferred to other recipients for compliance with all contractual obligations, to protect the company's assets, for legal protection and for compliance with legal obligations.

The controller may employ third parties as well, such as collaborators or professionals of other companies who are authorised to process the personal data disclosed to the controller.

### Processing

Processing by the controller is performed by automated means and/or manually, without profiling as per Article 22, paragraphs 1 and 4 of GDPR, pursuant to Articles 29 and 32 of GDPR, in compliance with the principles of lawfulness, purpose limitation and personal data minimisation under Article 5 of GDPR. Data are processed at the registered office and any other place of business either of the controller or of the supplier.



#### **Special categories of personal data**

The controller in the performance of his or her tasks, may receive personal data which can be defined as “special categories of personal data” revealing “*racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation*” and personal data relating to criminal convictions and offences. (Pursuant to Articles 9 and 10 of GDPR).

Personal data relative to the legal representative and/or the employees of the customer (identity card, photographs, etc.) belong to the above mentioned special categories.

#### **Transfer of personal data to third countries**

Personal data may be transferred to other Member States or third countries not belonging to the Union for the above mentioned purposes.

#### **Rights of the data subject**

At any time the data subject pursuant to Articles 15 to 22 of GDPR shall exercise the following rights:

- a) right to obtain access to the personal data from the controller, right to obtain information about the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipients to whom the personal data have been or will be disclosed and, where possible, the period for which the personal data will be stored;
- b) right to request rectification or erasure of personal data and restriction of processing;
- c) right to data portability, right to object to processing of personal data, right to object to automated decision-making, including profiling
- d) right to withdraw his or her consent at any time without affecting the lawfulness of processing based on consent before its withdrawal;
- e) right to lodge a complaint with a supervisory authority ((garante@gdpr.it or protocollo@pec.gdpr.it).

The data subject shall exercise his or her rights submitting written request to the controller.

Last updated July 2019

TARROS SpA

Signed original copy retained at the registered office address