

Policy on the processing of personal data in accordance with article 13 of the EU Regulation n. 2016/679

SUPPLIERS

Pursuant to and for the purposes of art. 13 of the European Regulation n. 2016/679 (hereinafter the "Regulation"), we provide with the following information regarding the processing of personal data supplied by you.

1. Data Controller

The data Controller is Trebon S.r.l., with registered office at Via Fratelli Bandiera n. 12, Trezzo sull'Adda (MI) - Italy, e-mail address: infoedatabreach.trebon@fratelliberetta.com (hereinafter the "Company").

2. Personal data

Personal data means any information that concerns you and is referable to you.

Specifically, the processing concerns the following data: name, surname, residence, telephone numbers, e-mail address, tax code and VAT number, bank details (hereinafter the "Data").

3. Purpose of the processing

As part of the business relationship with our Company, your data will be processed for the following purposes:

- a. order processing;
- b. execution of the supply or service delivery;
- c. compliance with administrative, accounting and tax obligations;
- d. fulfilment of additional legal and contractual obligations concerned with the business relationship, including those relating to taxation, health and safety in the workplace, public order and safety;
- e. payment of the consideration;
- f. data entry and/or update the suppliers' registry;
- g. exercise and defence of the Company's rights in every judicial, administrative, arbitration and/or mediation and conciliation proceedings.;

4. Legal basis of the processing

The processing of your data for the purposes indicated at the previous point 4) has its legal basis:

- with regard to point a) in the performance of pre-contractual measures adopted upon your request (Article 6, paragraph 1, letter b of the Regulation);
- with regard to points b), c), d) and e) in the performance of the contract, as well as in the fulfilment of the

obligations related thereto to which the Company is subject (art. 6, paragraph 1, letter b, c Regulation);

- with regard to points f) and g) in the legitimate interest of the Company (Article 6, paragraph 1, lett. f Regulation).

5. Methods of processing

For the purposes indicated at the previous point 4) and in compliance with the principles of lawfulness, fairness, transparency, accuracy, comprehensiveness and without excess, the processing of your data will take place on paper and in electronic form, in compliance with the legal provisions concerning the processing of personal data, by adopting adequate security measures.

Specially trained and instructed personnel, in order to ensure appropriate security and confidentiality, as well as to avoid risks of loss and/or destruction and access by unauthorized persons, will process your data.

6. Communication and dissemination of data

Your personal data will not be disclosed.

Within the strict limits relevant to the purposes indicated at the previous point 4) your data may be communicated to:

- Bodies of the Public Administration in compliance with specific legal obligations and in case of checks and inspections;
- Banks and insurance companies;
- Companies with which we have concluded contracts or commercial relationships, which require the communication of the Data;
- Financial administration;
- Judicial authority.

Your Data may also be communicated to:

- specifically authorized internal personnel of the Company who carry out activities connected and instrumental to the management of the contractual relationship (for example administrative, commercial and sales personnel);
- specifically appointed Data processors (natural persons or entities that process data in accordance with specific and documented instructions from the Company such as, by way of example, a person in charge of managing and maintaining IT systems, tax consultant, accounting firm, etc.).

The updated list of names of data processors is available at the Company's registered office.

7. Period of data retention

Your Data will be maintained for the entire duration of the business relationship and, in any case, until the period of limitation of the rights arising from such relationship has expired. For accounting and administrative purposes, the data will be stored for 10 years, except for the fulfilment of the conservation obligations provided for by the law.

8. Rights of the data subject

With reference to your data, you have the right to ask the Company in the manner established by the Regulation and without prejudice to the provisions and limitations pursuant to Legislative Decree n° 196/2003 (Part I - Title I - Chapter III):

- the access, in the cases provided for (art.15 of the Regulation);
- the rectification of inaccurate data and integration of those incomplete (art. 16 of the Regulation);
- the erasure of data for the reasons provided for (article 17 of the Regulation), such as lack of necessity with respect to the aforementioned purposes or in the event of processing not in compliance with the Regulation;
- the restriction of processing in the cases provided for (art. 18 of the Regulation): i.e. when the accuracy of the personal data is contested and it is necessary to verify its correctness;
- the portability, which means the right, in the cases provided for (art. 20 of the Regulation), to receive your personal data, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller;
- oppose the processing, in the case provided for (art. 21 of the Regulation).

You may exercise all the rights listed above by sending a notice to the Company by e-mail to the address infoedatabreach.trebon@fratelliberetta.com or by registered letter to the address of the Company: Via Fratelli Bandiera n. 12 - 20056 Trezzo sull'Adda (MI) - Italy.

9. Complaint

In the event that the processing of your personal data does not comply with the provisions of the Regulation you shall have the right to lodge a complaint with the supervisory authority in accordance with the requirement of article 77 of such Regulation.



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C.C.I.A.A. Milano n. MI-1841299 - Cod. Fisc., Part.
IVA e Reg. Imprese Milano n. 02060930134
PEC: trebon@pec.it

10. Nature of the provision of personal Data

The provision of your data is compulsory and is strictly necessary for the implementation of the pre-contractual measures adopted at your request, for the performance of the contract as well as for the fulfilment of obligations connected to it to which the Company is subject.

Therefore, failing to provide even part of your data entails the objective impossibility of fulfilling your request.

11. Transfer of personal data abroad

Your Data are not transferred abroad and they are stored at the Company's headquarters as well as on servers located within the European Union.