

## **CUSTOMER/SUPPLIER PRIVACY NOTICE**

**Drafted pursuant to Article 13 of EU Regulation 2016/679**

**SUBJECT:** Pursuant to Article 13 of EU Regulation 2016/679 (hereinafter the "Regulation"), the personal data provided by the data subject will be processed by SOFT ITALIA S.P.A. to enable the management of the pre-contractual and contractual relationship in compliance with the provisions of the Regulation. This notice does not govern the processing of personal data relating to legal entities, in particular companies with legal personality, including the company name and form of the legal entity and its "contact details" (Regulation - Recital 14).

**DATA CONTROLLER:** SOFT ITALIA S.P.A. (hereinafter the "Controller"), with registered office at Via Tosco Romagnola 1 – 56012 Calcinai (PI).

Contact email: [info@softitalia.com](mailto:info@softitalia.com)

**DATA PROTECTION OFFICER:** The Data Controller does not require the appointment of a Data Protection Officer pursuant to Article 37 of the Regulation.

**PURPOSE:** Personal data will be processed for the following purposes:

Management of the pre-contractual and contractual relationship and related activities (for example, but not limited to, management and administration of contracts, orders, arrivals, invoices, etc.).

Compliance with legal obligations.

**LEGAL BASIS FOR PROCESSING:** The legal bases for processing personal data are the fulfillment of pre-contractual and contractual obligations and the fulfillment of legal obligations incumbent on the Data Controller.

**METHODS OF PROCESSING AND STORAGE:** Processing will be carried out using electronic and paper-based tools, in compliance with the provisions of Article 32 of the Regulation. The data subject's personal data in relation to the purposes set out in this policy will be retained for the entire duration of the contractual relationship and for the time strictly necessary to achieve the purposes indicated in the "Purpose" section. Subsequently, they will be retained until the time permitted by Italian law to protect our interests and/or until any pending judicial or extrajudicial relationships arising therefrom are terminated.

**PLACE OF PROCESSING:** The data is processed at the Data Controller's offices and at the offices of any data processors.

**SCOPE OF COMMUNICATION AND DISSEMINATION:** The data subject's data may be disclosed to, or accessed by, our company's employees or collaborators, expressly designated by us as "authorized data processors" and/or appointed as "external data processors."

The complete list of appointed data processors is available at the Data Controller's headquarters.

The data subject's personal data will not be transferred to third countries or disseminated in any way.

**SPECIAL CATEGORIES OF PERSONAL DATA:** For the purposes set out in this privacy policy, the Data Controller does not need to Process personal data of a "special nature" pursuant to Article 9 of the Regulation.

**EXISTENCE OF AN AUTOMATED DECISION-MAKING PROCESS, INCLUDING PROFILING:** For the purposes set out in this privacy policy, the Data Controller does not adopt any automated decision-making process, including profiling, pursuant to Article 22, paragraphs 1 and 4, of the Regulation.

**RIGHTS OF THE DATA SUBJECT:** At any time, the data subject may exercise the rights provided for by the Regulation, Articles 15 to 22, and in particular the right to:

- a) request confirmation as to whether or not personal data concerning him or her exist;
- b) obtain information regarding the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be disclosed, and, where possible, the retention period;
- c) obtain rectification and erasure of data;
- d) obtain restriction of processing;
- e) obtain data portability, i.e., receive data from a data controller in a structured, commonly used, and machine-readable format, and transmit it to another data controller without hindrance;
- f) object to processing at any time, including for direct marketing purposes;
- g) object to automated decision-making concerning individuals, including profiling.
- h) request from the data controller access to personal data and rectification or erasure of such data, or restriction of processing concerning the data subject, or to object to such processing, in addition to the right to data portability;
- i) withdraw consent at any time, without prejudice to the lawfulness of processing based on consent before its withdrawal;
- j) lodge a complaint with the Supervisory Authority.

The data subject may exercise his or her rights by sending a written request to [info@softitalia.com](mailto:info@softitalia.com)

**SOFT ITALIA S.P.A.**