

## SUPPLIERS PRIVACY POLICY

*Arts. 13 -14 EU Reg. 2016/679 "GDPR"*

### **WHO IS THE DATA CONTROLLER?**

The Data Controller is **LA BOTTEGA S.P.A.**, with registered office in TRECATELLI (AN), 60012, address Marco Polo 2, Phone: 071 791191, E mail: : [info@labottega.com](mailto:info@labottega.com) , Pec: [labottegaspa@pec.labottega.com](mailto:labottegaspa@pec.labottega.com)

More information at: <https://www.labottega.com>

### **WHO IS THE DATA PROTECTION OFFICER?**

The Data Protection Officer (or Data Protection Officer -DPO) is your point of contact for any questions or issues related to the application of the GDPR, who can be reached at the following E-mail address: [privacy@labottega.com](mailto:privacy@labottega.com)

### **WHAT IS THE PURPOSE OF THE PROCESSING?**

We process your data for procedural purposes related to supplier management in fulfilment of contractual and legal obligations as required by civil, tax, accounting, administrative management and security regulations. In addition, they may also be processed for a scheduling of supply activities, order history, internal control services, evaluation of the quality of the services provided, management of complaints and for the feedback of forwarded requests for information. Within our organization, direct contact data (phone number, e-mail, contact data, etc.) referring to its workers and collaborators and also company-specific data always inherent to the existing contract between the parties may be collected and catalogued in order to improve the relevant references.

### **ON WHAT LEGAL BASIS DO WE PROCESS THE DATA?**

According to Art. 6 GDPR, letter b), the processing is necessary for the performance of a contract to which the data subject is a party.

### **FROM WHOM DO WE COLLECT DATA?**

We always collect personal data directly from the Data Subject wherever possible. If necessary for the purposes of our relationship with the Data Subject, we may make requests to public agencies or conduct searches of public records and/or databases

### **WHAT CATEGORIES OF DATA DO WE PROCESS?**

Primarily, we only request and process personal data categorized as "common." The provision of some personal data is mandatory in order to follow up on the supply relationship and its fulfilments, so without them, we will not be able to follow up on the relationship.

### **TO WHOM DO WE DISCLOSE PERSONAL DATA?**

The data are processed at the legal and operational headquarters of the Data Controller and in any other place where the parties involved in the processing may be located. Where applicable, your personal data may be disclosed to other public entities by complying with obligations under laws and regulations. Where appropriate, it may be disclosed to external companies that perform outsourced activities on behalf of the Data Controller, in their capacity as data processors.

### **HOW DO WE PROCESS THE DATA?**

Your personal data will be processed by the Data Controller through the use of paper and digital format. Only personnel authorized by the Data Controller will have access to it to carry out processing operations or systems maintenance. We take all useful technical and organizational measures to avoid problems of unauthorized access, disclosure, modification or destruction. We also specify that we do not use within our organization, an automated decision-making process, including profiling, which produces legal effects concerning you and/or significantly affects you.

#### **IS DATA TRANSFERRED TO COUNTRIES OUTSIDE THE EU?**

Your data will not be transferred to third countries outside the European Union and with data protection regulations that are not aligned with the GDPR; moreover, it will not be subject by us to any dissemination to unauthorized third parties for purposes other than those stated in this policy.

#### **HOW LONG DO WE KEEP THE DATA?**

We will process your data for the time necessary to achieve the stated purposes for which they were collected and they will be kept for the entire duration of the contractual relationship. They may also be kept even after the termination of the relationship for as long as is necessary to fulfill the contractual obligations undertaken and to carry out the relevant fulfillments required by current legislation. At the end of the foreseen period, the data will be destroyed, redelivered or processed ensuring compliance with the principle of minimization to protect the rights and freedoms of the data subject and always storing them with appropriate technical and organizational security measures.

#### **WHAT ARE YOUR RIGHTS?**

The data subject has the right to request from the Data Controller access to and rectification or erasure of personal data or the restriction of processing concerning him or her or to object to its processing, as well as the right to data portability, in accordance with the GDPR and, therefore, at any time he or she may request a digital copy of the data or its automatic transfer to other companies. In the cases provided, he or she may also object to or revoke the consent given. The data subject's right to lodge a complaint before the Italian Data Protection Authority([www.garanteprivacy.it](http://www.garanteprivacy.it)) remains unaffected. Any request to exercise rights will be evaluated within the limits of Articles 23 GDPR and 2-undecies and 2-duodecies Privacy Code. To exercise these rights or to obtain information on their content, please send a request via e-mail to the DPO address, above, using the "*GDPR Right exercise Form*" made available on the company website.