

POLICY ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION 2016/679 (GDPR) - [CUSTOMERS- SUPPLIERS]

The General Regulation on the Protection of Personal Data (EU Regulation 2016/679 of the European Parliament and the Council of 27 April 2016) henceforth GDPR, involves the protection of individuals in relation to the processing of personal data as a fundamental right.

Pursuant to Articles 13 and 14 of the GDPR, therefore, we inform you that:

1. DATA CONTROLLER

DIAMOND PAUBER SRL is the Data Controller, and its office is registered in via Aprilia,5 Massa (MS) CF and P. VAT 00362500456. The Data Controller has delegated Mr. Stefano Bernieri as Data Processor, who can be reached at: privacy@diamondpauber.it

2. HOW DATA ARE COLLECTED AND PROCESSED

The processed data are collected by the Data Subject, without any intermediary. Data processing will be carried out through operations with or without the aid of electronic or automated tools, in accordance with the art. 32 of Reg. EU 2016/679 therefore through the collection, registration, organization, storage, consultation, use, communication, deletion, and destruction of data. The operations may be carried out by the Data Controller and/or by the Data Controllers. The personal data that the company will acquire are not subject to disclosure.

3. CATEGORIES AND PURPOSE OF DATA PROCESSING

In order to execute and established of the contractual relationships: common personal data (personal data, Tax Code, addresses, e-mail telephone numbers), administrative data (VAT, IBAN, banks, chambers) and commercial data (relating to supplies) may be subject to processing. The data processing provided is only aimed to:

- managing personal data based on current regulations.
- drafting of estimates for the initiation of business relations based on current regulations.
- signing sale contracts of products related to the type of business according to current regulations.
- managing of the contracts (invoicing, banking management, miscellaneous communications).

The personal data you provide will be processed in compliance with the law and the related obligations of confidentiality, based on the principles of correctness, lawfulness, transparency, and protection of the rights of the Data Subject.

4. LEGAL BASIS FOR PROCESSING

The data processing legal basis is the need to fulfil legal and contractual obligations as required by current legislation. Any refusal to provide those obligations, will determine the impossibility for the Data Controller to execute the contract or to carry out correctly the legal obligations.

Any other processing that does not fall within the legal basis outlined above, will be the subject of a separate formal request to the data subject by the Data Controller.

5. SCOPE OF COMMUNICATION AND DISSEMINATION OF DATA

The data processed for the above purposes are not subject to disclosure, they also will be still communicated and made accessible to employees and collaborators assigned to the competent offices of the Data Controller, that, in their capacity as Data Protection Officers and/or system administrators and/or authorised data

processors and Data Processors (external), will be adequately instructed and informed by the Data Controller for this purpose.

The Data Controller may communicate the personal data provided by you to other public authorities if they must process the same for any proceedings within its institutional competence and to all those public entities to which, in the presence of the relevant conditions, the communication is required by community provisions, laws or regulations.

6. DATA TRANSFER ABROAD

Since your data are stored and managed through cloud-servers and external mail-servers, they can be transferred to non-EU third countries, in compliance with current legislation. In particular, the tools used are Cloud OneDrive Microsoft, Outlook Microsoft, Aruba.

7. DATA STORAGE PERIOD

The data required for contractual and accounting purposes are kept for the necessary time for the business relationship conduct. All the documentation subject to retention times established by law, will respect the time of the relevant regulations, for the other documents: they will be kept within the limits of what will be necessary to achieve the purpose for which the data were collected.

8. DATA SUBJECT RIGHTS

According to Articles 15, 16, 17, 18, 20, 21 and 22 of the GDPR the data subject has the right to:

- access to his or her own personal data and all the information referred to in Article 15 of the GDPR;
- rectification of inaccurate personal data; integration of incomplete personal data; deletion of personal data; except for those contained in acts that must be kept unless there is an overriding legitimate reason to proceed with the processing.
- the limitation of processing, where one of the hypotheses referred to in art. 18 of the GDPR applies.
- to receive in structured format, commonly used and readable by automatic device personal data concerning him or her which have been provided to a data controller and has the right to transmit such data to another data controller without hindrance by the data controller who has provided them.

The data subject has also the right:

- to object to the processing of his or her own personal data, without prejudice to what is provided with regarding the obligation and necessity of processing for the purposes of establishing the relationship.
- to revoke any consent given for non-compulsory data processing, without prejudice to the lawfulness of the processing based on the consent given before the withdrawal.
- to submit a complaint with the Data Protection Authority pursuant to art. 77 of the GDPR (<http://www.garanteprivacy.it>)

9. DPO

The Data Controller has decided not to designate a Data Protection Officer using the information mentioned in article 37 of the reference regulation (GDPR). The data subject may exercise all the above rights by sending an e-mail to the Data Protection Officer at the following e-mail address: **privacy@diamondpauber.it**

10. AGREEMENT

According to the data collection procedures, the related processing purposes referred in part 2 and in reference to the legal basis defined in par. 4, the provision of data provided by you does not require specific consent. The provision of data for marketing purposes of the company is optional and will be subject to other specific information.

Data Controller
DIAMOND PAUBER SRL