

# Information to customers and suppliers pursuant to art. 13 of the 2016/679 European Regulation on the protection of personal data

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The processing of data relating to legal persons does not fall within the scope of application of the personal data protection discipline established by the Regulation. For purposes of clarity and transparency with regard to its Customers and Suppliers, 3b S.p.A. also makes this information available to legal entities, describing the methods and purposes of all processing that the Company performs or has the right to perform involving personal data. The information specifically concerns the data of natural persons who work for our customers and suppliers.

### 1. Introduction

Pursuant to art. 13 of EU Regulation 2016/679, **3B S.p.A.** (hereinafter "the Company"), with registered office in Via delle Industrie, 1 - 31040 - SALGAREDA (TV) - Italy - Ph: +39 0422747053 - Fax: +39 0422747594 - VAT no. 01749830269 - mail: 3bspa@3bspa.com, Data Controller of the processing of personal data already communicated or that will be communicated in the future and from which the personal data are or will be collected, wishes to inform you that the data concerning you may be processed, in compliance with the afore-mentioned legislation, by the Company in relation to contractual relationships with you or to those that may be entered into in future.

It should be noted that the Data Controller has appointed a Data Protection Officer, who can be contacted at the address privacy@3bspa.com.

### 2. Source of personal data

Personal data, acquired or that will be acquired in relation to contractual relationships or in the precontractual phase, are collected directly from the data subject. All personal data collected are processed in compliance with the current legislation and, in any case, with due confidentiality.

## 3. Nature of the collection

For the stipulation and execution of the contractual relationship, the collection of personal data is also mandatory, as it is necessary to comply with legal and tax obligations; the refusal to provide such personal data will make it impossible to establish relations with the Company. The related processing does not require the consent of the data subject.

## 4. Purpose and legal basis of the processing

The sole purpose of the collection or processing of personal data is to adequately meet the obligations relating to the performance of the Company's economic activity and in particular for:

- the execution of pre-contractual activities and the acquisition of preliminary information for the purpose of stipulating the contract;
- the management of the contractual relationship and of all the administrative, operational, management and accounting activities relating to the contract (order management, invoicing, checks on the reliability of customers and suppliers, after-sales assistance and support);
- the management of litigation, breach of contract, warnings, transactions, arbitrations and judicial disputes;
- the fulfilment of the obligations established by the laws, regulations, European Community regulations and provisions issued by authorities.

The processing takes place by virtue of the fulfilment of the contractual/pre-contractual and legal obligations related to the relationship established by you with the Company.















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# 5. Nature of the provision and consequences of any refusal

The provision of personal data to the Company is mandatory only for personal data for which there is a regulatory or contractual obligation to do so, or for the personal data necessary to acquire precontractual information activated at the request of the data subject. In the event of a refusal to provide such "mandatory" personal data, the contract may not be fully exercised. Any refusal to provide personal data for which there is no obligation to provide, but strictly functional to the execution of contractual relationships, will not in principle entail any consequences in relation to ongoing relationships, except for the possible impossibility of follow up on operations connected to such personal data or the impossibility of establishing new relationships. Any refusal to provide personal data referring to the performance of further activities, not strictly functional to the execution of contractual relationships, will only prevent the performing of such further activities without other consequences.

## 6. Processing methods

The processing of personal data will be carried out in a lawful and correct manner and in any case in compliance with the afore-mentioned legislation, using tools suitable to guarantee their security and confidentiality and may also be carried out through IT tools designed to store, manage and transmit the data.

The processing will mainly be carried out by the internal organisation of the company under the direction and control of the designated company personnel and for the purposes indicated above, also by Group companies or by third parties, as identified in section 9 below.

The storage of personal data will take place in a form that allows the identification of the data subject for a period of time not exceeding that necessary for the purposes for which they are collected and processed.

### 7. Processing duration

The personal data being processed will be kept for the time strictly necessary with regard to the contractual relationship, as well as, subsequently, for the fulfilment of all legal obligations relating to or deriving from the contract entered into by you with the Company.

### 8. Personal data recipients

Without prejudice to communications made in fulfilment of a legal obligation, a regulation or European Community legislation and intra-group communications, the communication may involve the following subjects, even through simple consultation or the making available of personal data concerning you:

- a. public bodies, supervisory bodies, authorities or institutions;
- b. Companies belonging to the 3b S.p.A. Group, subsidiaries or associates of our Company, located in Italy or abroad;
- natural or legal persons who provide specific services: data processing, logistic and postal services, customer satisfaction surveys, legal, administrative, tax and/or accounting consultancy, the organisation of trade fairs and communication events;
- d. commercial intermediaries, banks and credit institutions, financial intermediation companies, natural or legal persons responsible for credit recovery, auditing and/or the certification of financial statements and quality systems, independent collaborators of the Company, agents and reporting agents, insurers and brokers;















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e. natural and/or legal persons who request references/data for the purpose of any participation in public tenders, or in the context of the execution of supply contracts towards their customers by 3b S.p.A.

The subjects referred to in sections a), d) and e) operate as independent Data Controllers.

We reassure you that, in any case, the personal data necessary and relevant to the purposes of the processing for which they are designated are transferred exclusively to the afore-mentioned subjects, if not involving aggregated personal and anonymous data.

The list of such third parties will be constantly updated and accessible to you upon request to the Company. By virtue of the existence of links with them by electronic, computer or correspondence means, personal data may be made available abroad, possibly even outside the countries belonging to the EU in consideration of the existence of the relative authorisation, or based on standard contractual clauses.

In no case will personal data be disseminated.

## 9. Rights of the data subject

This notwithstanding your right to exercise the rights provided for by art. 15 of EU regulation 2016/679 and the rights provided for by arts 16, 17, 18, 21 of EU Regulation 2016/679 regarding the correction, deletion, limitation of processing and the right to object, in the manner established by art. 12 of EU Regulation 2016/679, by contacting the Data Controller at the address **privacy@3bspa.com**.

# 10. Right to lodge a complaint, pursuant to art. 77 of EU Regulation, with the Guarantor Authority

If our Company does not respond to you within the time limits provided for by the law or if the response to the exercise of your rights is not appropriate, you may lodge a complaint with the Guarantor for the protection of personal data.

Here are the details: Guarantor for the protection of personal data - www.gpdp.it - www.garanteprivacy.it - E-mail: garante@gpdp.it - Fax: (39) 06.69677.3785 - Telephone switchboard: (+39) 06.69677.1.











