

Information on personal data processing -articles 13 and 14 EU General Data Protection Regulation 2016/679 (“GDPR”)

Dear Customer/Supplier,

in relation to the processing of your personal data (as defined in article 4, numbers 1) and 15), articles 9 and 10, of EU Regulation 2016/679, "Regulation" or “GDPR”), Elettra Tlc S.p.A. (hereinafter also "Elettra" or, simply, "the company" or “the controller”) provides you, below, the information relating to the processing of personal data processed with reference to the relations between us (from the first contact, to the pre-contractual phase up to the stipulation, management and maintenance of reciprocal relations).

Given that the GDPR does not cover the processing of personal data which concerns legal persons and in particular undertakings established as legal persons, including the name and the form of the legal person and the contact details of the legal person), any processing of data other than those just indicated, would take place for the pursuit of the purposes indicated in this information.

The processing of data will be based on the principles set out in Articles. 5 and 25 of the GDPR.

Furthermore, we inform you that the subjects who process personal data are authorized to carry out the necessary operations and can only have access to information functional to the performance of the assigned tasks.

The personal data collected and processed by the controller are:

- identification data (company name or name, registered office, tel., Fax, e-mail, tax data, etc.);
- data relating to economic and commercial activity (orders, solvency, bank data, accounting and tax data, etc.);
- contact details (email and telephone number of the contact persons).

These data are provided by you directly or can be collected from third parties as independent data controllers or as data processors (for example from commercial information companies, registers, lists or public databases for data relating to financial solvency, etc.).

1) Data processing purposes

Elettra processes your data for the purposes of:

1. fulfill regulatory obligations;
2. to execute the stipulated contracts and related commitments;
3. provide for the organizational and commercial management of the contract;
4. conduct internal analysis and statistics.

The provision of data and the related processing is necessary in relation to the need to fulfill regulatory and contractual obligations as well as the correct management of the relations.

2) Processing methods and lawfulness of processing

The legal basis of the processing for purposes 1 to 3 is identified in Article 6, paragraph 1, lett. b) of the Regulations.

While, the legal basis of the processing for the purpose referred to in number 4 is found in the legitimate interest of the Data Controller.

Personal data will be processed in paper, computerized, telematic form and entered in the relevant databases, which can be accessed by authorized subjects, coherently with the functions assigned to them.

3) Third parties to whom the data could be communicated or who could learn about them as data controllers or data processors

The data that Elettra collects and processes for the purposes indicated may be disclosed to the following subjects or categories of subjects:

- a) Banks;
- b) Financial administrations and other companies or public bodies in fulfillment of regulatory obligations;
- c) Accounting auditors;
- d) Application maintenance companies;
- e) Hosting company;
- f) Consulting firms and law firms;
- g) Certification bodies.

The communication, by Elettra, of personal data referring to your Company does not authorize the recipients of this communication to process the data for other purposes without having given the necessary information and obtained a free consent, where required.

The aforementioned personal data will not be disseminated.

4) Data retention

Personal data will be kept in compliance with the terms provided by the tax regulations and for the duration of the statutory prescription and, subsequently, canceled or made anonymous unless legal obligations or other legitimate reasons do not induce the Owner to a different behavior

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

5) Rights of data subjects and data controller

Whoever is in the position of interested party, has the right, at any time, to exercise the rights referred to in Articles 15-22 of the GDPR and, in particular, to obtain from the data controller the confirmation that a processing of his/her personal data is or is not underway and in this case, he/she has the right to access them.

Furthermore, he / she has the right to ask the data controller to rectify or delete personal data or limit the processing that concerns them or to oppose their processing, in addition to the right to data portability.

He/she also has the right to lodge a complaint with the Control Authority (in Italy this is the Guarantor for the protection of personal data).

To exercise your rights or for any information regarding the protection of your personal data, you can contact Elettra's Data Protection Officer (DPO) writing to the office in Via Cristoforo Colombo, 163 00147 Rome, or sending an email to privacy@elettratic.it.

Rome, 4th May 2023

Elettra Tlc S.p.A.