



Dear SUPPLIER,

Subject: Privacy Policy Statement

Pursuant to art. 13 of EU Regulation 679/2016 (**GDPR**), Oltrefrontiera Progetti S.r.l. single-member company, with registered office in Milano, Corso Venezia, 36 and executive offices in Via Capuana, 41, Barlassina (Monza Brianza) (the **Company**), in its capacity of data controller, informs as follows.

1. Scope. This statement is applicable to suppliers (including potential suppliers) of the Company in any legal form constituted (companies, freelance professionals, individual entrepreneurs), to natural persons or referents of legal entities that conclude contracts with the Company for the supply of goods and services, including procurement and subcontracting, and, in general, to the natural persons they represent or that are employed by or in any way linked to such persons for the purposes of the execution of the aforementioned contracts.

2. Nature of the data processed. The processed data are collected directly by You or third parties such as public databases, register of enterprises, internet and include personal data, tax identification data, complete contact details, physical data and telephone contacts (including mobile numbers), fax, email addresses, PEC (certified email address) and, in general, the information necessary for the execution of the contract, such as bank account details and/or data relating to the payment system. In addition to the aforementioned data, the Company may process, in relation to the personnel of suppliers/contractors/subcontractors, the following data: (a) employing company, qualification, level, social security and insurance data and suitability to perform certain activities; (b) particular categories of data, such as, for example, data contained in medical certificates for the performance of work tasks. In this case, if you are a legal entity customer, in your capacity as an independent Data Controller, you guarantee the Company that the communication of these data to our Company has been carried out in compliance with the legal obligations regarding the processing of personal data of the law, having You, in turn, complied with these obligations, with a commitment to release the Company in the event of any dispute or claim.

The processing will be based on principles of correctness, lawfulness, transparency and protection of your privacy and your rights in compliance with the provisions on privacy. In any case, data that can be classified as special or of a judicial nature will not be processed.

3. Purpose and legal basis of the data processing. Personal data are processed within the limits, for the purposes and for the duration specified in this statement and, in particular, for the purposes of:

- (a) collecting the information necessary for the establishment of any contractual relationship;
- (b) fulfilling pre-contractual and contractual obligations with suppliers and properly managing existing contractual relationships;
- (c) fulfilling the obligations imposed by laws, regulations, community legislation or by an order of the Authority;

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Iscriz. Registro Imprese di MILANO, Cod. Fiscale, P. IVA 02776890135 **SEDE LEGALE:** Corso Venezia, 36 – 20121 Milano (MI) ITALY

SEDE FISCALE/OPERATIVA:

Via L. Capuana, 41 – 20825 Barlassina (MB) ITALY – Tel. +0039 (0)362 68.20.1 – Fax +0039 (0)362 68.15.91 info@oltrefrontieraprogetti.com

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(d) exercising the rights of the Data Controller such as, for example, the right to defense in court or performing internal control services such as, for example, quality assurance, fraud prevention and cyber security, in compliance with legal obligations in pursuing their legitimate interests.

The processing of data relating to the personnel of suppliers/contractors/subcontractors is carried out in order to protect the Company with respect to solidarity bonds provided for by law.

The legal basis of the processing is the execution of a contract of which You are a party, the execution of pre-contractual measures with the Company adopted upon Your request, the fulfillment of legal obligations to which the Company is subject to as Data Controller; as well as the pursuit of a legitimate interest of the Company (in which case, more information about the examination of the balancing of interests is available at Your request). The processing of data relating to the personnel of suppliers/contractors/subcontractors is carried out to fulfill legal obligations, as well as to pursue the legitimate interest of the Company.

4. Obligation or optional nature of consent. The provision of data by the parties involved is necessary to allow the Company to fulfill its legal obligations as well as its contractual obligations or to respond to pre-contractual requests. Any refusal to provide personal data, in whole or in part, will not allow the Company to respond to the request, to execute the contract and/or comply with legal obligations.

5. Methods of processing. The processing of personal data will include the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, comparison or interconnection, limitation, cancellation or destruction.

The processing of personal data is carried out by means of manual and/or computerized tools with organizational and processing logic strictly related to the purposes thereof and in any case in order to guarantee the security, integrity and confidentiality of the data. In particular, processing and/or filing operations by paper means are carried out at the Company's executive offices, while the data processed and filed with the aid of IT supports are stored on servers located within the European Union.

The Company does not perform automated data processing in relation to the aforementioned purposes.

6. Video surveillance. The Company uses a video surveillance system installed at the executive offices for the pursuit of a legitimate interest (preserving and protecting the company assets and guaranteeing safety in the workplace). Complete information can be consulted at the Company's executive offices.

7. Categories of subjects to whom personal data may be disclosed. For the performance of some of the activities related to the processing of personal data, the Company may communicate data to the following categories of external subjects:

(i) final customers of the Company and other suppliers, with whom a contractual relationship exists, limited to the execution of the supply;

(ii) companies, entities, professionals who, on behalf of the Data Controller, provide specific processing services or perform instrumental or support activities related to those of the Data Controller (for example, in the field of electronic invoicing) or other businesses required for the execution of the outstanding contract with You, such as, by way of example, banking institutions, insurance companies,

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shipping and transport companies, job consultants, independent collaborators of the Company, freelance professionals, legal and tax consultants;

(iii) subjects to whom the communication of personal data is necessary or is in any case functional to the performance of the Company's activities (such as auditing and certification companies);

(iv) other subjects to whom the right to access personal data is recognized by provisions of law, regulation or community legislation (such as Public Authorities).

The subjects belonging to the categories to which data may be communicated will use such data as Data Controllers in accordance with the law, in complete autonomy, being unrelated to the original processing carried out at the Company or as Managers, only by virtue of specific appointment by the Company.

Data will not be disclosed.

8. Data Controller and subjects who may become aware of personal data. The list of companies designated as Data Controllers is available at the Company and may be requested by writing to info@oltrefrontieraprogetti.com.

Consistent with the aforementioned purposes, personal data may be brought to the attention of the personnel of the Company in charge of the related administrative and IT management and the personnel entrusted with activities that involve the processing of data for one of the aforementioned purposes (such as the Administrative Manager and the employees of the Administration Office).

9. Data retention. Personal data are processed for the time necessary to fulfill the purposes for which they were collected. In addition, the Company retains personal data to comply with legal obligations, if so required. For example, the law imposes the obligation to keep the invoices for ten years. In addition, the Company retains personal data by expiry of the statute-of-limitations period in order to be able to assert its rights in court. With regard to personal data relating to the personnel of suppliers/contractors/subcontractors, they will be deleted after three years from the termination of the contract, unless a claim/dispute arises, in which case the data will be kept for the time required for the exercise of the right of defense and the management of the litigation. Without prejudice to the foregoing, at the end of the applicable retention period, personal data will be deleted or stored in such a way that the data subject is no longer identifiable.

10. Transfer of personal data abroad. Personal data, for example those pertaining to the employees of a supplier responsible for the supply for a final customer located in a non-EU country, may be transferred to any of these countries, provided that such transfer (in any case, occasional) is necessary for the performance of obligations arising from a contract to which the supplier is a party or to fulfill, prior to the conclusion of the contract, specific supplier requests, or for the conclusion or execution of a contract stipulated in favor of the supplier itself.

11. Rights of the data subject. Pursuant to articles 13, paragraph 2, letters (b) and (d), as well as the provisions of articles 15 to 21 of the GDPR, You can exercise, in accordance with the provisions herein, the following rights in relation to personal data concerning You:

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- request access and obtain a copy;
- obtain correction;
- request cancellation;
- obtain processing limitation;
- receive personal data in a commonly used and legible structured format from an automatic device for the purpose of exercising the right to portability;
- oppose the processing.

The rights can be exercised by sending a request to the email address info@oltrefrontieraprogetti.com.

You have the right to lodge a complaint with the Guarantor for the Protection of Personal Data, with registered office in Rome, Via Monte Citorio 121 (phone +39 06696771), following the procedures and instructions published on the Authority's website www.garanteprivacy.it.

12. Data Controller. The Data Controller is Oltrefrontiera Progetti S.r.l. single-member company, with registered office in Milan, Corso Venezia, 36 and executive offices in Barlassina (Monza Brianza), Via Capuana 41, in the person of its legal representative.

Barlassina, 7th November 2018

The Data Controller
Oltrefrontiera Progetti S.r.l. single-member company

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