# Privacy Notice for Suppliers regarding the Processing of Personal Data pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)

This privacy notice describes the purposes and methods of processing the personal data of suppliers (hereinafter referred to as the "Data Subjects") of **Refrind S.r.l. dei F.lli Bettini** (hereinafter referred to as "**Refrind**").

## 1) Data controller

The Data Controller is **Refrind S.r.l.**, Via B. Colleoni no. 35/37, 24060 Gorlago (BG), Italy.
Contact details: email: info@refrind.com , website: www.refrind.it, Tel: +39 035 300474, Fax: +39 035 290425 , VAT Number: 01976920163

## 2) Data protection officer

Pursuant to Article 37 of Regulation (EU) 2016/679 (GDPR), Refrind has decided not to appoint a Data Protection Officer (DPO), as it is not a public authority and its core activities do not involve the regular and systematic monitoring of data subjects on a large scale, including the categories of data referred to in Articles 9 and 10 of the GDPR.

## 3) Purposes, Methods and Place of Processing

**Refrind** collects and processes the personal data of Data Subjects in order to conduct its business activities, provide information, products and services that may be of interest, carry out necessary pre-contractual and contractual activities, perform market analyses and undertake commercial activities.

Personal data will be processed:

a) For purposes related to the contractual relationship established between the parties;
b) For civil, tax and accounting purposes;
c) To comply with legal obligations, regulations, European Union legislation or orders issued by competent authorities (such as anti-money laundering obligations).

Personal data are processed using both automated and manual tools for the period strictly necessary to achieve the purposes for which they were collected. Appropriate security measures are adopted to prevent data loss, unlawful or improper use and unauthorized access.

Processing activities related to the services are carried out at Refrind's premises and only by specifically authorized personnel appointed as data processors and/or persons authorized to process personal data.

## 4) Categories of Personal Data and Recipients

**Refrind** Refrind collects the personal data necessary for the provision of its services, including, by way of example and not limited to:

- Company name
- Telephone number
- Email address
- Tax code
- VAT number
- First and last name
- Banking details for invoice payments
- Other information necessary for business relations

Refrind does not request special categories of personal data (sensitive data), and such data will not be disclosed.
Personal data may be communicated to:

- Public authorities for the performance of institutional functions;
- Accountants;
- Lawyers for legal assistance in contractual disputes;
- Consulting firms, professionals and entities that support the company in various sectors;
- Banking institutions;
- Inspection and supervisory bodies.

These entities shall process the data as independent Data Controllers.

## 5) Provision of Data and Consequences of Refusal

The provision of data for the purposes described above is mandatory. Failure to provide such data may prevent Refrind from delivering the services covered by the contractual relationship.

## 6) Data Transfers Abroad

Personal data will not, under any circumstances, be transferred outside Italy.

## 7) Data Retention Period

Personal data processed for pre-contractual and contractual purposes are retained for the period strictly necessary to achieve the purposes for which they were collected, including:
Managing and responding to requests from competent authorities;
Managing judicial and extrajudicial disputes;
Handling and responding to compensation claims.

## 8) Rights of Data Subjects

Data Subjects may exercise the rights provided by Articles 15 to 22 of the GDPR, including:

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| Art.15 | **Right of Access**<br>The data subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning them are being processed and, where that is the case, access to the personal data and the following information:<br>a) the purposes of the processing;<br>b) the categories of personal data concerned;<br>c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;<br>d) where possible, the envisaged period for which the personal data will be stored or, if not possible, the criteria used to determine that period;<br>e) the existence of the data subject's right to request from the Data Controller the rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;<br>f) the right to lodge a complaint with a supervisory authority;<br>g) where the personal data are not collected from the data subject, any available information as to their source;<br>h) the existence of automated decision-making, including profiling referred to in Article 22(1) and (4), and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.<br>Where personal data are transferred to a third country or to an international organisation, the data subject has the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer. |
| Art.16 | **Right to Rectification**<br>The data subject has the right to obtain from the Data Controller, without undue delay, the rectification of inaccurate personal data concerning them.<br>Taking into account the purposes of the processing, the data subject also has the right to have incomplete personal data completed, including by means of providing a supplementary statement. |
| Art.17 | **Right to Erasure ("Right to be Forgotten")**<br>The data subject shall have the right to obtain from the Data Controller the erasure of personal data concerning him or her without undue delay, and the Data Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:<br>a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;<br>b) the data subject withdraws consent on which the processing is based according to Article 6(1)(a), or Article 9(2)(a), and where there is no other legal ground for the processing;<br>c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2);<br>d) the personal data have been unlawfully processed;<br>e) the personal data must be erased for compliance with a legal obligation in Union or Member State law to which the Data Controller is subject;<br>f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1). |
| Art.18 | **Right to Restriction of Processing**<br>1.The data subject has the right to obtain restriction of processing where one of the following applies:<br>a) the accuracy of the personal data is contested by the data subject, for a period enabling the Data Controller to verify the accuracy of the personal data;<br>b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;<br>c) the Data Controller no longer needs the personal data for the purposes of processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;<br>d) the data subject has objected to processing pursuant to Article 21(1) pending verification whether the legitimate grounds of the Data Controller override those of the data subject. |
| Art.19 | **Notification Obligation Regarding Rectification, Erasure or Restriction of Processing**<br>The Data Controller shall communicate any rectification, erasure or restriction of processing carried out pursuant to Articles 16, 17 and 18 to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.<br>The Data Controller shall inform the data subject about those recipients if the data subject requests it. |
| Art.20 | **Right to Data Portability**<br>The data subject has the right to receive the personal data concerning them, which they have provided to a Data Controller, in a structured, commonly used and machine-readable format and has the right to transmit those data to another Data Controller without hindrance from the original Data Controller.<br>When exercising the right to data portability, the data subject has the right to have the personal data transmitted directly from one Data Controller to another, where technically feasible. |
| Art.21 | **Diritto di opposizione e processo decisionale automatizzato relativo alle persone fisiche**<br>1.The data subject has the right to object, at any time, on grounds relating to their particular situation, to the processing of personal data concerning them, including profiling.<br>The Data Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.<br>2. Where personal data are processed for direct marketing purposes, the data subject has the right to object at any time to processing for such marketing, including profiling related to such direct marketing.<br>3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes. |
| Art.22 | **Automated Individual Decision-Making, Including Profiling**<br>1. The data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them. |

## 9) Exercise of Rights

Requests to exercise the rights described above may be submitted to the Data Controller, without any specific formalities, by sending an email to: acquisti@refrind.com

## 10) Right to Lodge a Complaint

The data subject has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) if they believe that the processing of their personal data infringes applicable data protection legislation.
Contact details:
Address: Piazza Venezia 11, 00187 Rome, Italy
Fax: +39 06 69677 3785
Tel.: +39 06 696771
Email: garante@gpdp.it

Certified Email (PEC): protocollo@pec.gpdp.it

**11) Source of Personal Data**

The personal data are primarily collected directly from the data subject. Certain data may also be obtained from publicly available sources.

Refrind S.r.l.