

PRIVACY NOTICE

PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

Content

INTRODUCTION	1
1. DATA CONTROLLER.....	1
2. DATA PROTECTION OFFICER.....	1
3. CATEGORIES OF PROCESSED DATA AND LEGAL BASIS FOR PROCESSING	2
4. PURPOSE OF THE PROCESSING	2
5. NATURE OF DATA PROVISION	3
6. PROCESSING METHODS	3
7. DATA RECIPIENTS.....	3
8. DATA RETENTION PERIOD	3
9. DATA PROCESSOR.....	3
10. RIGHTS OF DATA SUBJECT.....	4

INTRODUCTION

Teoresi S.p.A., in accordance with the applicable legislation, undertakes to process your personal data in accordance with the principles of lawfulness, fairness, transparency, pertinence and minimisation established by Article 5 of EU Regulation 2016/679 "on the protection of natural persons with regard to the processing of personal data ("GDPR").

Teoresi S.p.A. invites you to read the following privacy notice drawn up pursuant to Articles 13 and 14 GDPR. This privacy notice is addressed to all suppliers, either natural or legal person, which not being employed by Teoresi S.p.A., provide the latter with tangible or intangible products or services ("Data Subjects").

1. DATA CONTROLLER

The Data Controller of your data processing is Teoresi S.p.A., with registered office in Turin, Via Perugia, 24 - 10152 - P.IVA 03037960014.

The contact details of the Data Controller are: Tel. 011.2408000; e-mail: privacy@teoresigroup.com; PEC: teoresi.adm@pec.it

2. DATA PROTECTION OFFICER

Teoresi appointed a Data Protection Officer so as required by the GDPR ("Data Protection Officer" or "DPO"), entrusted by law with monitoring the compliance with the Regulation, as well as tackling requests from data subjects within the context of the legitimate exercise of the rights recognized by the Regulation, and acting as a reference point towards the Privacy Authority.

For all issues related to the processing of your personal Data and/or to the exercise of your rights listed under point 10 of this notice, you may contact the DPO to the following email address: dpo.ask@teoresigroup.com

3. CATEGORIES OF PROCESSED DATA AND LEGAL BASIS FOR PROCESSING

The Data Controller will process your personal data collected during the establishment and the execution of the employment contractual relationship.

The processing will concern the following Data:

- a) Personal Data, such as: first name, last name, gender, tax code, residential address and telephone number, place and date of birth, e-mail address and/or certified email address (meaning common identification and contact data) and job title.

The processing of such personal data will be carried out for the execution and management of the business contractual relationship with the company, for the fulfilment of the obligations the Data Controller is subject to, and for commercial and promotional communications purposes on the legal basis of the legitimate interest. With regard to the latter, reference is made to the following art. 4 relating to the purposes of the processing.

- b) Banking data

- c) Tax data

The processing of personal data referred to in points d) and e) will be carried out for the purposes of the execution of the contract the data subject is party to, and of the fulfilment of a legal obligation the Data Controller is subject to.

4. PURPOSE OF THE PROCESSING

The Data you provide will be used for the following purposes:

- management of pre-contractual and post-contractual phases underlying the existing business contractual relationship;
- drafting and execution of purchase requests;
- orders issuance;
- fulfilment of all legal obligations, including those in both civil and accounting fields;
- accomplishment of operational, administrative, organizational, managerial, tax, financial, insurance and accounting requirements relating to the relationship established;
- management of access to company's premises;
- management of potential arising disputes;
- evaluation of the supplier in the light of the specific requests as to supply activities set out in the Standards adopted by the Company.

In addition, your data will also be processed for the following purposes:

- safeguarding corporate assets and preventing wrongdoing. This is achieved, inter alia, by means of the video surveillance system. The placement of image detection systems takes place in compliance with the regulations on the protection of personal data and other applicable provisions. The processing of data through the video surveillance system will in any case be relevant and not exceeding the purposes pursued.

5. NATURE OF DATA PROVISION

The provision of your personal data is necessary for the abovementioned purposes, in the light of the legal and contractual obligations the Data Controller is to be compliant with, in order to properly establish the business contractual relationship and ensure the proper management thereof. Failure to provide, in whole or in part, such Personal Data, will make it impossible for the Data Controller to establish with you any business contractual relationship nor to guarantee the proper execution thereof.

6. PROCESSING METHODS

Data will be processed and collected through paper-based instruments, computer and telematic media, also by entering them into databases, archives, platforms, suitable to ensure the security and confidentiality of the Data, in accordance with the provisions of art. 32) of the European Privacy Regulation UE/2016/679 (GDPR).

Your Data will be processed only by personnel expressly authorized by the Data Controller. The decision-making process will not be automated.

7. DATA RECIPIENTS

Data will be included in the records and registers required by law and will be transmitted to Social Security Institutes, financial offices and Public Administrations, where required (e.g. Revenue Agencies, Municipalities, Regions, Provinces, Chambers of Commerce) in compliance with the law.

Your Personal Data may be shared by the Company with the following subjects:

- all those subjects entitled to lawfully access to such data by virtue of legislative measure,
- our collaborators, employees in charge of data processing, as part of their duties,
- to all those natural and/or legal persons, public and/or private when the disclosure is necessary or functional to the establishment and management of the underpinning contractual and/or commercial relationship, according to the modalities and for the purposes described above (eg: companies or professional firms that provide assistance and advice to the Company).

8. DATA RETENTION PERIOD

Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimisation, your Data will be kept for the time necessary to achieve the purposes effectively pursued, pursuant to art. 5 of the GDPR and in connection with the employment relationship. In any case, the retention period of your personal data will not exceed:

- 10 years in compliance with the obligations relating to the holding of accounting records and in any case for the time necessary for the legal protection of the Data Controller;
- 72 hours for data collected through the video surveillance system.

9. DATA PROCESSOR

Your personal data may also be processed by third parties, which, by virtue of their appointments as Data Processors pursuant to art. 28 of the Regulations, carry out on behalf of Teoresi further activities linked to the business contractual relationship.

10. RIGHTS OF DATA SUBJECT

As a data subject, you may exercise the rights provided for by Art. 15 et seq. GDPR against Teoresi. In particular, you may obtain:

- access to your personal Data and all other information set out in Article 15 GDPR;
- the rectification of Data if they are inaccurate and/or their integration if they are incomplete (Art. 16 GDPR);
- the erasure (so-called "right to be forgotten"), anonymization or blocking of Data processed in breach of the law, including Data whose storage is not necessary in relation to the purposes for which the data was collected or subsequently processed, except for that information which must be mandatorily stored by the Data Controller unless there is a legitimate reason prevailing over the one of the Data subject to continue the processing activity (art.17 GDPR);
- Processing limitation of your personal Data if one of the cases referred to under Article 18 GDP occurs.

According to what is prescribed by the GDPR, you also have the right:

- to object the processing of your Data, unless one of the conditions set out in art. 23 of the GDPR occurs,
- to lodge a complaint to the Guarantor for the Protection of Personal Data, pursuant to art. 77 GDPR, whether you consider that your Data Processing infringes the legislation in force.

To exercise your rights under Article 15 et seq. GDPR you may send a communication to privacy@teoresigroup.com. Your request will be processed by the Data Controller within 28 days.
