



Privacy Notice for the Processing of Suppliers' and Consultants' Personal Data

In application of the GDPR - EU Regulation no. 679/2016 and pursuant to the Personal Data Protection Code - Legislative Decree 30 June 2003, no. 196, as amended by Legislative Decree 10 August 2018, no. 101 Provisions for the adaptation of national legislation to the provisions of Regulation EU 2016/679.

We inform Suppliers and Consultants that Tubi Italflex, for the establishment and execution of contractual relationships currently in progress with you, is in possession of Your personal data which will be processed in relation to contractual requirements and the consequent fulfillment of legal and contractual obligations deriving therefrom, as well as to achieve effective management of commercial relationships.

DATA CONTROLLER

The Data Controller is: Tubi Italflex S.r.l. S.B., with registered office at via Monte Nero 31/37-20008 Bareggio MI in the person of the Legal Representative Corrado Sangalli.

Privacy Contact Person: For the exercise of rights, the Privacy contact person is Mr. Corrado Cantagalli, contactable via email at the address c.cantagalli@tubi-italflex.it.

METHODS OF PERSONAL DATA COLLECTION

Your personal data may be collected directly from You (e.g., request for a quote, assignment of a task) or, in some cases, from external sources, such as websites, third parties known to you, and/or public domain sources Revenue Agency.

TYPES OF DATA COLLECTED

The information we process may include the following data:

- Personal data such as personal details and/or address.
- Contact data as collected in relation to the supply, actual or only proposed, of your services.
- Data derived from identity documents.
- Bank account details.
- Correspondence and communications exchanged.
- Possible education, training, and professional qualification data.
- Data relating to requests for information by You.
- Public domain data available at the tax Revenue Agency and/or Chamber of Commerce.
- Information relating to regulatory and other types of investigations or litigation to which You are or have been subject.

Tubi Italflex S.r.l. S.B.

Via Monte Nero, 35 · 20008 - Bareggio (MI) · Italy · tel.: +39 02 931588.1 · fax: +39 02 93169269
P.IVA / C.F.: 00755040151



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Specific Note on Identity Documents The Data Controller collects data derived from identity documents such as name, surname, date of birth, tax code/VAT number exclusively for the following purposes, in fulfillment of a legal obligation or for the strict execution of the contract:

- Fulfillment of legal, fiscal, and anti-money laundering obligations (Purpose B).
- Necessity of unique identification of the Legal Representative or the person in charge for the signing of specific contracts and legal acts (Purpose A).

MINIMIZATION PRINCIPLE: The Company **does not retain a digital or paper copy of the complete identity card**, unless retention is explicitly required by a rule of law. In all other cases, only the data strictly necessary for the fulfillment of contractual and legal purposes are extracted and retained.

THE METHODS OF PERSONAL DATA PROCESSING

Your personal data may, for example, be collected and used in order to:

- Request a quote in relation to the services offered by you.
- Confer an assignment in your favor and subsequent provision of the requested services.
- Fulfill the obligations deriving from the contract in place between You and Tubi Italflex.
- Manage communications via email, telephone, mail, or website.
- Receive personal data from third parties and/or public domain sources such as the tax Revenue Agency.

PURPOSES OF PROCESSING AND LEGAL BASIS

A. Execution of Contractual and Pre-contractual Obligations

- **Legal Basis:** Performance of a Contract.
- **Nature of Provision:** Mandatory. Refusal to provide data entails the impossibility to proceed or continue any agreement inherent to the commercial activity.

B. Fulfillment of Legal and Fiscal Obligations

- **Legal Basis:** Legal Obligation.
- **Nature of Provision:** Mandatory. Refusal makes the relationship illicit.

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C. Management of Commercial Relationship and Defense of Rights

- **Legal Basis:** Legitimate Interest of the Controller.
- **Nature of Provision:** Optional, but necessary for the Controller.

CLARIFICATION ON THE LEGAL BASIS OF LEGITIMATE INTEREST The Controller declares that the processing based on Legitimate Interest (Purpose C) is necessary for the effective conduct and protection of its business. This interest has been the subject of a specific Balancing test and is deemed prevalent. The data subject retains the **Right to Object** at any time for reasons connected to their particular situation.

SUBJECTS WHO MAY PROCESS PERSONAL DATA

Tubi Italflex S.r.l S.B. as Data Controller informs that the personal data of suppliers/consultants may be processed by subjects designated by the Controller, appointed and authorized by written letter of appointment. Furthermore, Tubi Italflex has appointed as **Data Processor** some of its suppliers/consultants. The complete list of designees and Processors is available at the company and may be requested by You at any time by contacting the Privacy contact person Mr. Corrado Cantagalli.

DATA RETENTION

The information collected will be retained for the entire duration of the established contractual relationships and, even subsequently, for the time necessary for the fulfillment of all legal requirements and for protection connected to contractual obligations. The data will be deleted after **10 years** from the cessation of the last contractual relationship, without prejudice to any longer limitation periods provided by law or necessary for the management of litigation.

COMMUNICATION AND DISSEMINATION OF DATA

Personal data may be communicated exclusively to third parties providing services necessary for the indicated purposes (for example: IT and cloud services, professional consultants, administrative, banking, and tax services). Such subjects operate as **Data Processors**, based on contracts compliant with the GDPR, and adopt adequate technical and organizational measures.

Transfers to third countries Personal data are processed **entirely within the European Union**. No transfers to third countries nor access by subjects located outside the European Economic Area are foreseen.

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DATA PROTECTION RIGHTS

Your rights provided by the GDPR for the processing of your data, which may be exercised by You at any time, are:

- Right of Access allows you to receive a copy of Your personal information.
- Right of Rectification allows the user to correct any incomplete or inaccurate information.
- **Right of Erasure (Right to be forgotten)** allows you to ask us to delete or remove personal information where there are no valid reasons to continue processing it.
- Right to Object to the processing where a legitimate interest is invoked and there are elements relating to a specific personal situation that prompt objection to the processing.
- Right to Object to the automated decision-making process, including profiling.
- Right to Limitation of the processing allows you to obtain the suspension of the processing of your personal data.
- Right to **Data Portability** receive in a structured format the personal data concerning him/her provided to a data controller and request to transmit such data to another data controller.
- Right to Withdraw Consent where you might have provided consent for a specific purpose.

To exercise one of these rights, please contact the Privacy contact person Mr. Corrado Cantagalli by sending an email message to the address c.cantagalli@tubi-italflex.it.

You have the right to lodge a complaint with the The Italian Data Protection Authority (Garante per la protezione dei dati personali) is an independent administrative authority established by the so-called privacy law (Law No. 675 of 31 December 1996) and regulated subsequently by the Personal Data Protection Code (Legislative Decree No. 196 of 30 June 2003) as amended by Legislative Decree No. 101 of 10 August 2018, which also established that the Italian DPA is the supervisory authority responsible for monitoring application of the General Data Protection Regulation (pursuant to Article 51 of Regulation No. 2016/679).

CONTACT INFORMATION

The Italian DPA is based only in Rome. **Address:** Piazza Venezia 11 - 00187 Roma (Italy)

Phone: +39 06.696771 Email account: protocollo@gdpd.it

Certified email account: protocollo@pec.gdpd.it (*this account can only receive mail from PEC-certified email accounts*)

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Front Office

If you need information on processing and protecting personal data or wish to submit reports or claims to the DPA or ask questions, or if you need support regarding proceedings and relationships with the DPA or just would like to receive documents and information materials.

Open: Mon-Fri, 10 AM to 12,30 PM

- Phone: +39 06.69677.2917 (*Monday to Friday, 10 to 12:30*)

- Email account: urp@gdpd.it

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