

PRIVACY INFORMATION FOR PERSONAL DATA PROCESSING

According to D.L. n. 196/2003 and EU Regulation n. 679/2016 (GDPR) and with regard to personal data of your concern and that will be the object of processing activity, we inform you that:

1. PURPOSE OF DATA PROCESSING

The company ROSSELBA SPA, with registered office in Località Ottone, 3 – Portoferraio 57037 (LI) P.I. 00155950496 is the Data Controller. and will process his supplier's data for below purposes only:

- a) Supplier census and recording in supplier list;
- b) evaluation on supplier reliability (property reliability, economic and organizational capacity, references, professional qualifications, contributory regularity, insurance coverage, conflicts of interests, anti-corruption and anti-money laundering obligations, possible reputational repercussions of the relationship);
- c) management of contracts drawn up with suppliers referring performance of work or service, including the activity concerning accounting records and collection, fulfillment of obligations under EU laws, regulations or rules and provisions issued by Authorities legitimated by law and Supervisory Bodies of control;
- d) Supplier evaluation with regards to activities conducted on behalf of ROSSELBA SPA;
- e) legal obligations related to civil, fiscal, accounting; fulfillment of obligations deriving from stipulated contracts; assistance and technical support regarding the products and services you have purchased, including after-sales and post-warranty periods if expressly provided, administrative management of reports;

2. LEGAL BASIS OF DATA PROCESSING

Supplier personal data will be treated following consent expressed by signing this information paper.

We inform you that, without any consent or after its revocation, your personal data may be used in the following circumstances and legal basis:

- a) If data processing is necessary in the execution of a contract you are part of, or in the execution of pre-contractual measures your request;
- b) If data processing is necessary for ROSSELBA SPA legal obligation;
- c) c) If data processing is necessary for the safety of your vital interests or another person's interests
- d) d) If data processing is necessary for the execution of public interest task or linked to the exercise of public power of which ROSSELBA SPA is responsible
- e) If data processing is necessary for ROSSELBA SPA pursuit of legitimate interest; in particular we consider legitimate interests:
 - Interest to draw up, manage and execute contracts as per point 1 c);
 - Interest to protect one's rights that may directly or indirectly arise from those contracts;
 - Interest to protect company safety and assets;

at the condition that all interests, rights and fundamental freedoms of the person who asks for protection of his own data don't prevail.

3. DATA COLLECTED BY THIRD PARTIES

We inform you that personal data subject to processing activity, in particular those referred to point 1. b) may be collected by third parties through access to public database or through dedicated inspection services or through request for references to past supplier's customers.

Categories of acquired data by third parties refer to point 1, b): property reliability, economic and organizational capacity, references, professional qualifications, contributory regularity, insurance coverage, conflicts of interests, anti-corruption and anti-money laundering obligations, possible reputational repercussions of the relationship.

4. DATA PROCESSING METHOD

Personal data processing may be executed through analogic, electronic or automatic methods, using methods and procedures strictly necessary to pursuit of above mentioned scopes.

ROSSELBA SPA conducts data processing directly through his own organization subjects or through external subjects. Those subjects will treat data:

- a) In accordance to instructions received from their company, respectively as authorized or responsible, among which employees and collaborators of the company within functions they are assigned to and exclusively for the achievement of the specific purposes indicated in this statement;
- b) In total autonomy, as autonomous holders.

5. DATA PROVISION

Considering the autonomy of concerned person, directly acquired data provision can be:

- a) compulsory according to law, regulation or EU legislation and also according to disposition issued by authorities legitimated by the law or issued by supervisors and control bodies;
- b) Strictly necessary to the agreement of new contracts between supplier and ROSSELBA SPA or to management and execution of ongoing ones.

6. REFUSAL OF DATA RPROVISION

Any opposition to the processing of data and / or refusal by the interested party to provide personal data may result in the impossibility or refusal, in whole or in part, to insert or maintain the supplier in the supplier list, to stipulate new contracts with it or to execute those already in place, to fulfill obligations under the laws, regulations or community regulations, or by provisions issued by Authorities legitimated by the law and by Supervisory and Control bodies.

7. DATA COMMUNICATION AND DISCLOSURE

Personal data, exclusively following scopes of point 1, may be communicated to:

- a) ROSSELBA SPA personnel and collaborators authorized to data processing by the company;
- b) banks, service companies for registration, enveloping, transport and sorting of documents, contractors companies or service providers, notaries, lawyers, experts, consultants and specialized companies for debt collection and auditing;
- c) Subjects to whom communication is due complying to any collective agreements (labor unions) or specific legal obligation (Public security bodies or any other public authority)

Any other data distribution is excluded.

8. RIGHTS OF THE INTEREST PARTY

Data protection legislation (art. 7-10 D.Lgs. 196/2003 and art. 12-22 EU REGULATION 679/2016) grants the right to be informed on data processing, and the right of any access to those data and request for updating integration and amendment. Where applied, the interested party can also claim the right to the deletion of

data, to the limitation of their processing, to the portability of data, to the opposition to treatment and the right not to be subjected to decisions based solely on automated processing.

If personal data processing is based on interest party's approval, he has the right to revoke that approval.

The interest party regarding the exercise of his own rights and also regarding any detailed information about the subjects or the categories of subjects to whom data are communicated or who are aware of them as responsible or authorized subjects, may contact the data protection reference person at

ROSSELBA SPA, administrative headquarte: via dei Mutilati 3/d, 37122 Verona, tel. 045.4857840, e-mail info@vacanzedicharme.it, pec ufficivialeoncino@legalmail.it e registered office: Località Ottone 3, 57037 Portoferraio (LI), tel. 0565.933101, or mailing to: privacy@vacanzedicharme.it

If he considers that his rights have been violated, he can protect himself by proposing a complaint before the Guarantor for the protection of personal data.

9. DATA CONSERVATION PERIOD

Personal data will be kept for the period necessary to achieve the purposes referred to in point 1 and, following the exhaustion of these purposes, until the limitation period of the rights arising from you and ROSSELBA SPA as a consequence of the legal and factual relations between the parties and connected directly or indirectly to those purposes (10 years).

10. THIRD PARTIES DATA RPROCESSING

Supplier is aware that, if he involves his own personnel or collaborators (sub-suppliers as well) in the execution of services for ROSSELBA SPA, their personal data can be treated by ROSSELBA SPA for contacts management with supplier's reference persons and assignees. These treatments have the same purposes, methods and retention times of the data described in this statement; in relation to these treatments, in addition, the interested parties have the same rights identified in point 8.

The supplier undertakes to correctly inform the interested parties involved about the aforementioned treatments, also by submitting them to this statement and by registering their signature for inspection.