



INFORMATION
in accordance with Article 13 of EU Regulation 679/2016

PIVA GROUP S.P.A. (the “**Controller**”), acting in the capacity of data controller, in accordance with Article 13 of EU Regulation 679/2016 (the “**General Data Protection Regulation**”) and amendments, collects and subsequently processes the personal data¹ of its customers and suppliers (the “**Data Subject**”).

1. Purposes and methods of processing.

The personal data of the Data Subject are processed within the scope of the normal business activity of the Controller, for the following purposes:

1. proper and full performance of existing contractual obligations (the “**Contract**”);
2. fulfilment of administrative or accounting requirements strictly relating to the Contract;
3. fulfilment of specific obligations provided for under the law and the applicable regulations including EU regulatory provisions (for example, “anti-money laundering” rules);
4. informing the Data Subject of promotional and marketing initiatives, where appropriate by sending advertising and/or promotional material (for example, newsletters), using automated means and/or traditional methods of contact.

Personal data processing is performed under the authority of the Controller by persons specifically appointed, authorised and instructed for this purpose under Article 29 of the General Data Protection Regulation, using manual, computerised or telematic means and logic strictly relating to the relevant purposes, and in any case in such a way as to guarantee the confidentiality and security of the personal data. Processing of personal data may also be performed on behalf of the Controller by Processors appointed for this purpose in accordance with Article 28 of the General Data Protection Regulation.

Personal data will be stored for a period to be determined using criteria based on the nature and duration of the Contract and the need to protect the interests of the Data Subject.

2. Legal basis for processing, nature of provision and consequences of refusal, consent by the Data Subject.

2.1) Purposes under Paragraph 1, points 1., 2. and 3. above.

In relation to the purposes under Paragraph 1, points 1., 2. and 3. above, provision of personal data is obligatory and constitutes a prerequisite for the performance of the Contract; indeed, failure to provide consent will make it impossible to receive the services forming the subject matter of the Contract. Therefore, the legal basis for relevant processing is proper performance and management of the Contract.

¹ In accordance with Article 4 of the General Data Protection Regulation, “**personal data**’ means any information relating to an identified or identifiable **natural person** (**‘data subject**’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

2.2) Purposes under Paragraph 1, point 4. above.

In relation to the purposes under Paragraph 1, point 4. above, provision of personal data is optional and failure to provide consent will merely make it impossible to receive updates on promotional and marketing initiatives, where appropriate by sending advertising and/or promotional material (for example, newsletters).

3. Entities or categories of entity to which personal data may be disclosed and scope of disclosure.

In relation to the purposes of processing described above, and within the limits strictly relating to such purposes, the Data Subject's personal data will or may be disclosed to the following categories of entity:

- (i) financial authorities and other public authorities, as required under the law or at their request;
- (ii) credit institutions for payment instructions or other financial activities required for the performance of the Contract;
- (iii) external bodies and/or companies used by the Controller for activities relating to, required for or resulting from performance of Contract;
- (iv) external consultants (for example, for management of tax requirements), who are not appointed in writing as Processors;
- (v) external persons or entities exercising supervisory activities, such as auditing companies, the board of statutory auditors and supervisory bodies;
- (vi) factoring companies and/or specialised companies or law firms for the purposes of credit recovery and/or protection of the Controller's interests or rights.

The above-mentioned entities, to which the Data Subject's personal data will or may be disclosed (since not appointed in writing as Processors), will process the personal data in full autonomy as Controllers in accordance with the General Data Protection Regulation, as they are unrelated to the original processing carried out by the Controller.

The updated list of specified entities and Processors is available on request by the Data Subject.

The Data Subject's personal data will not be disseminated.

Wherever necessary for the performance of the Contract, the personal data of the Data Subject may be transferred to EU and/or non-EU countries in full compliance with the General Data Protection Regulation, with the relevant measures and decisions issued by the Privacy Authority, as well as with the applicable EU regulatory provisions. Specifically, the Controller undertakes to comply with the provisions of Decision 2001/497/EC, Decision 2004/915/EC and Decision 2010/87/EC (as relevant to the specific case), which require signing of a so-called "standard contractual clauses" between parties involved in data processing in non-EU countries.

4. Rights of the Data Subject.

Under Articles 15 and ff. of the General Data Protection Regulation, Data Subjects have the right to obtain:

- confirmation as to whether or not personal data concerning them exist, even where not yet recorded, and their communication in easily intelligible form;

- specification of the origin of the personal data, the processing purposes and methods, the logic applied in case of processing using electronic instruments and the identity of the Controller;
- updating, rectification, completion, erasure, anonymisation or blocking of data processed unlawfully (including data that need not be stored for the purposes for which they were collected or subsequently processed);
- certification that those to whom the data have been disclosed or disseminated have been made aware of these operations (and their contents), except where this requirement proves impossible or is manifestly disproportionate in relation to the right protected.

The Data Subject also has the right to:

- withdraw, at any time, consent to any processing of their personal data performed (without affecting the lawfulness of processing carried out based on consent given prior to its withdrawal);
- object to, in all or in part and on legitimate grounds, processing of their personal data, even where the data are relevant for the purposes for which they were collected;
- object to, in all or in part, processing of their personal data for sending of advertising material, direct sales, market research or commercial communication;
- lodge a complaint with the supervisory authority for personal data protection in the cases provided for under the General Data Protection Regulation;
- the portability of their data within the limits of Article 20 of the General Data Protection Regulation.

To obtain a detailed and up-to-date list of the entities to which their personal data may be disclosed and to exercise their rights under Articles 15 and ff. of the General Data Protection Regulation, Data Subjects should contact the Controller at:

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Place and date

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