



Piva Group SpA

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CODICE SDI: SUBM70N
cap. soc. i.v. € 7.000.000

**Nuova sede legale
e Amministrativa:**

Via Roma, 139
37060 Roncanova
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Identificazione Esportazione:
IT 03427790237



CERTIFICAZIONE ITALIANA DEI
SISTEMI QUALITÀ DELLE AZIENDE

DISCLOSURE

pursuant to Article 13 of EU Regulation 679/2016

PIVA GROUP S.P.A. (hereinafter, the “Data Controller”), in its capacity as Data Controller, pursuant to Article 13 of EU Regulation 679/2016 (hereinafter, the “Privacy Regulation”), as amended and supplemented, collects and subsequently processes the personal data¹ of its Customers and Suppliers (hereinafter, the “Data Subject”).

1. Purpose and methods of processing.

The personal data of the Data Subject is processed as part of the Data Controller's business activities, for the following purposes:

1. the proper and complete performance of the obligations pursuant to the concluded contractual relationship (hereinafter, the “Contract”);
2. administrative and accounting compliance strictly related to the Contract;
3. compliance with specific obligations provided by law, regulations or Community legislation (e.g. those relating to “anti-money laundering” rules);
4. updating the Data Subject about promotional and marketing initiatives, also by sending advertising and/or promotional material (e.g. newsletters), by means of automated tools and/or traditional contact methods.

The processing of personal data is authorised by the Data Controller and carried out by entities specifically appointed, permitted and instructed to process such data pursuant to Art. 29 of the Privacy Regulation, using manual, IT or telematic tools, in strict correspondence with the purposes of the processing and in any case in such a way as to guarantee the confidentiality and security of the personal data. Personal data may also be processed on behalf of the Data Controller by specially appointed data processors pursuant to Art. 28 of the Privacy Regulation.

The personal data will be stored for a period determined in accordance with criteria based on the nature and duration of the Contract and the need to protect the interests of the Data Subject.

¹ Pursuant to Art. 4 of the Privacy 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. Legal basis of the processing, nature of the provision and consequences of a possible refusal, consent of the Data Subject.

2.1) Purposes referred to in paragraph 1, points 1., 2. and 3. above.

With reference to the purposes referred to in paragraph 1, points 1., 2. and 3. above, the provision of personal data is compulsory and is a necessary requirement for the execution of the Contract; failure to provide such data makes it impossible to receive the service covered by the Contract; therefore, the legal basis of its processing is the proper execution and management of the Contract.

2.2) Purposes referred to in paragraph 1, point 4 above.

With reference to the purposes referred to in paragraph 1, point 4. above, the provision of data is optional and failure to provide consent will result only in



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the impossibility of receiving updates on promotional and marketing initiatives, also by sending advertising and/or promotional material (e.g. newsletters).

3. Entities or categories of entities to whom personal data may be communicated and the scope of the communication.

In relation to and within the limits strictly pertinent to the aforementioned purposes of the processing, the personal data of the Data Subject will or may be communicated to the following entity categories:

(i) the tax authorities and other public authorities, where required by law or at their request;

(ii) credit institutions for payment instructions or other financial operations instrumental to the execution of the Contract;

(iii) external structures and/or companies used by the Data Controller for the performance of activities connected with, instrumental to or consequent upon the execution of the Contract;

(iv) external consultants (e.g. for the management of tax obligations), unless they have been designated in writing as Data Processors;

(v) external entities that perform control activities, such as auditing firms, boards of statutory auditors, supervisory bodies;

(vi) factoring companies and/or specialised companies or law firms for the recovery of debts and/or for the protection of their interests/rights;

The entities indicated above, to whom the personal data of the Data Subject will or may be communicated (insofar as they have not been designated in writing as Data Processors), will process the personal data in their capacity as Data Controllers pursuant to the Privacy Regulation, in full autonomy, being unrelated to the original processing carried out by the Data Controller.

An up-to-date list of the entities indicated and of the data processors may be provided at the request of the Data Subject.

The data of the Data Subject will not be disseminated.

Should this be necessary for the execution 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 provisions of the Privacy Regulation, the measures and decisions of the Personal Data Protection Authority on the matter, and with EU legislation. In particular, the Data Controller undertakes to comply with the respective provisions set out in Decisions 2001/497/EC, 2004/915/EC and 2010/87/EU (depending on the circumstances of the case), which require the signing of so-called "standard contractual clauses" between the legal entities involved in the processing of non-EU data.

4. Rights of the Data Subject.

Articles 15 et seq. of the Privacy Regulation give the Data Subject party the right to obtain:

- confirmation of the existence or otherwise of personal data relating to them, even if not yet recorded, and the communication of such data in intelligible form;

- indication of the origin of the personal data, the purposes and methods of processing, the logic involved in the event of processing carried out with the aid of electronic instruments, and the identification details of the Data Controller;

- the updating, rectification, integration, erasure, anonymisation or blocking of data processed in breach of the law (including data whose storage is not



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- necessary for the purposes for which the data is collected or subsequently processed);
- certification that such operations have been brought to the attention of those to whom the data has been communicated or disseminated (including the content thereof), except where this proves impossible or involves the use of means that are manifestly disproportionate to the right protected.
- The Data Subject also has the right:
- to revoke at any time the consent given to the processing of personal data, where applicable (without prejudice to the lawfulness of the processing based on the consent given before the revocation);
 - to object, in whole or in part, on legitimate grounds, to the processing of personal data concerning them, even if it is relevant to the purpose of collection;
 - to object, in whole or in part, to the processing of personal data concerning them for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communications;
 - to lodge a complaint with the Personal Data Protection Authority in the cases provided for by the Privacy Regulation;
 - to the portability of personal data within the limits of Art. 20 of the Privacy Regulation.

In order to obtain a detailed and updated list of the entities to whom the personal data of the Data Subject may be communicated and to exercise the rights under Articles 15 et seq. of the Privacy Regulation, the data subject may contact the Data Controller:

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Gazzo Veronese, 08/04/2022



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