

INFORMATION ABOUT SUPPLIERS PERSONAL DATA PROCESSING PURSUANT TO ART. 13 OF REGULATION EU 679/2016

Vivax srl, based in Via Zanotti 14, 28040 Borgo Ticino (NO) VAT n.02570290037, in the person of the legal representative, hereinafter named "Vivax srl" or "The Controller", as the controller of personal data processing pursuant to **Regulation EU 679/2016 General Data Protection Regulation**, hereinafter "GDPR", recognize the importance of personal data protection and consider it one of his main goal.

With the present circular we are giving you due information about the processing of personal data given by supplier natural person or natural person working for supplier legal person, pursuant to Article 13 of GDPR. Before giving us any information, Vivax srl invites you to read carefully this circular, as it contains important information about personal data protection and security measures in order to ensure high standards of confidentiality, as required by the current regulation.

Vivax srl informs you that your personal data will be processed using manual, informatic and telematic instruments, in compliance with the following principles: lawfulness, fairness, transparency, limitation of purposes and conservation, minimisation of data, accuracy, integrity and confidentiality, protecting rights and freedom of the data subject.

Your data will be processed with the following purposes, in compliance with GDPR and always ensuring the protection and confidentiality of those data.

Definitions

"GDPR": EU Regulation 679/2016 of the European Council and Parliament, declared on 27/04/2016 and applied since 25/05/2018, about personal data protection during data processing.

"Personal Data": every information about a natural person identified or identifiable (Data Subject), with a specific focus on identification elements such as name, ID number, address, online identification, one or more peculiar elements of physical, mental, economic or social identity.

"Special category Data": every personal data that can reveal ethnic or racial origin, religious or philosophical beliefs, political opinions, trade union membership, genetic data, biometric data, data concerning health or natural person's sex life or sexual orientation.

"Processing": any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

1. Processing object

The controller treats only personal or identity data voluntarily given from you (orally, by business card, request of information, e-mail, documents delivery, website etc.) for example: name, surname, place and date of birth, personal address, work address, business name, VAT number, fiscal code, phone number, fax number, e-mail address, certified e-mail address, employer, business role, IBAN etc.

2. Processing purpose and legal basis, nature of consent and refusal

Data will be processed without your explicit consent (article 6, letters b, c, f, GDPR) for the following purposes:

- a) performing a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract
- b) manage legal obligations of administrative, fiscal, statutory nature and fulfil any other legal obligation derived from UE law, regulations or an order from the Authority to whom the Controller is subject.
- c) to establish, exercise or protect a Controller's right in court and/or outside the court, or anytime the Authorities exercise their legal functions.

The legal basis of the processing which purposes are considered in the letter a) is the performing of a contract to which you are party or taking steps at your request prior to entering into the contract, so it's the fulfilment of contractual or pre-contractual obligations based on legal relationship set up or on the way of setting up with you.

The legal basis of the processing which purposes are included at letter b) is legal obligation to which the Controller is subject, for the purposes included at letter c) is legitimate interest pursued by the Controller.

We inform you that for the purposes outlined above at letters a), b), c) the conferral of data is mandatory. An eventual missing, incomplete or incorrect conferral or an express refusal to the processing will make impossible for the Controller to fulfil the contract, to take steps at your request, to conclude contract and to fulfil legal obligations or orders from Authorities.

The legal subject can oppose to the processing anytime in the way provided for by GDPR and as described below.

3. Processing place and mode, conservation time.

Data processing will take place at the Controller's head office outlined above and at third parties' places identified below.

Your data will be processed in compliance with lawfulness, fairness and transparency principles, ensuring an appropriate level of security, giving protection to data from illegal or non-authorized usage and from accidental damage or destruction with technical and operational measures. Data will be processed using manual, informatic and telematic instruments, having in mind the purpose for which they were collected, ensuring their security and for the time strictly necessary for achieving such purposes, except the possibility to retain data for a longer time in order to fulfil legal obligations as provided for by Italian national law.

More information about the conservation period can be obtained writing directly to the Controller.

4. Data recipients

Other than those who can be recipients of data as provided for by contract or legal obligations, all your data could be shared, only for the purposes outlined before, with the following recipients' categories:

-Controller's employees and staff, as authorized to process personal data, which are bound to confidentiality.

-Third parties (natural person or legal person, for example. Banks, consultants, solicitors etc.), party of a contract with the Controller with the purposes outlined above or required by legal obligations, with a specific task and for the time strictly necessary to complete those purposes, usually qualified as external responsible for the data processing.

-Judicial Authorities or Supervisory Authorities, public administrations, in the exercise of their duties.

The Controller assure that the data processing led by those subjects is compliance with the current legislation.

5. Data communication

The Controller could share your data for the purposes outlined above, without an explicit consent (article 6 letters b), c), f) GDPR) to Supervisory or Judicial Authorities, public administration, insurance company, banks, consultants, generic third party and all those subject for whom the communication is mandatory by law or by contract or by your specific request, all those subjects will be autonomous Controller for those data processing.

In any case, your data won't be disclosed.

6. Data conservation and transfer

Your personal data will be retained on a server set in the Controller headquarter, in the European Union.

The Controller has the power to transfer his server outside EU if he considers it necessary, in this case, the Controller assure that this transfer will take place in compliance with the current legislation, after the conclusion of specific standard contractual clauses as required by European Commission.

7. Data subject's rights

We inform you that as provided for by the GDPR, you'll have the following rights:

- a) Right of access: to obtain the confirmation that your data are being processed, and in that case, ask for specific information about purposes, kind of data, conservation time, recipients (article 15 GDPR)

- b) Right to rectification: to obtain, without unjustified delay, the rectification of incorrect or incomplete personal data (article 16 GDPR)
- c) Right to erasure: to obtain, without unjustified delay, the erasure of your personal data in the cases provided for by GDPR (article 17 GDPR)
- d) Right to restriction of processing: to obtain the restriction of data processing, in the cases provided for by GDPR (article 18 GDPR)
- e) Right to data portability: to obtain a copy readable by an automatic device of your personal data and the transmission of those data to a specific subject, in the cases provided for by GDPR (article 20 GDPR)
- f) Right to object: to object to personal data processing, unless there is a legit reason for the Controller to continue (article 21 GDPR)
- g) Right to withdraw the consent anytime without prejudice for the legitimation of the processing put in place until the withdraw
- h) Right to lodge a complaint to the Italian Privacy Supervisory Authority (Autorità Garante per la protezione dei dati personali, set in Piazza di Montecitorio n. 121 - 00186 Rome (RM))

8. How to exercise your rights

You can exercise your rights anytime by:

- a letter to: Vivax srl, Via A. e L. Zanotti, 14, 28040, Borgo Ticino, NO
- an email to: Vivax srl, Via A. e L. Zanotti, 14, 28040, Borgo Ticino, NO

9. Controller, Managers and authorized staff

As provided for by GDPR, the Controller is Vivax Srl, based in Via Zanotti 14, 28040 Borgo Ticino (NO) as outlined above.

The external managers list and the authorized staff list is kept in the Controller head quarter.

For any information about your personal data processing please write an e-mail to:

privacy@vivaxsrl.it

10. Changes

This information is valid from 25/05/2018. The Controller can change or adjust the content, partially or completely, also because of changes in the current legislation.