


DATA CONTROLLER	DOCUMENT	REGULATORY REFERENCES
	<p align="center">PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA</p> <p align="center">Suppliers</p>	<p align="center">Reg. (EU) 2016/679 – GDPR Arts. 12, 13</p>

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA
pursuant to Art. 13 of Regulation (EU) 2016/679
(General Data Protection Regulation – GDPR)

1. GENERAL INFORMATION

This notice describes how the personal data of the contact persons of supplier companies that establish business relationships with the companies of the Lincotek Group are processed. The processing of your personal data will be carried out in accordance with the principles of fairness, lawfulness, transparency and protection of your confidentiality and your rights.

2. JOINT CONTROLLERS

Given the structure of the commercial process adopted by the Lincotek Group, which relies on a centralised management system operated by the parent company, the processing of your personal data takes place under a regime of **joint controllership** pursuant to Art. 26 of Regulation (EU) 2016/679 (hereinafter, “GDPR”).

The Joint Controllers are listed at the following link: [List of Joint Data Controllers](#)

The companies listed above have jointly determined the purposes and means of the processing of your data for the management of the business relationship. They have therefore entered into a joint controllership agreement to define their respective responsibilities regarding compliance with the obligations arising from the GDPR. The essential content of this agreement is available on request, to be addressed to the Data Protection Officer at the contacts indicated in paragraph 3 below.

In particular, the agreement designates Lincotek Group as the point of contact to facilitate the exercise of the rights granted by the applicable legislation

3. CONTACT DETAILS OF THE DATA PROTECTION OFFICER

The Lincotek Group has appointed a Data Protection Officer (hereinafter, “DPO”), who may be contacted for any matter relating to the processing of your personal data at the e-mail address: dpo@lincotek.com.

4. PERSONAL DATA PROCESSED

During the term of the contractual relationship with the supplier, and within the limits of the purposes set out in point 3 of this notice, the Data Controller may process certain categories of personal data. By way of example, the processing may concern:


- a) personal identification data (first name, surname, tax code, place and date of birth);
- b) contact data (telephone number; e-mail address);
- c) banking and payment data;
- d) in certain cases, and in compliance with specific regulatory obligations, with regard to the Supplier’s personnel, data relating to the professional sphere (category; specific certification attestations; attestation of general and specific training on workplace safety; copy of the identification badge).

5. PURPOSES, LEGAL BASIS FOR PROCESSING AND NATURE OF THE PROVISION OF DATA

Personal data are processed on the basis of specific legal bases, for the purposes detailed below:

- a) to fulfil pre-contractual, contractual and tax obligations arising from existing relationships, as well as to manage the necessary related communications (Art. 6(1)(b) GDPR);
- b) to comply with obligations laid down by law, by regulation, by EU legislation or by an order of the Authority, with particular reference to workplace safety regulations, in order to protect the health and safety of persons accessing the Company’s premises and facilities (Art. 6(1)(c) GDPR)
- c) to pursue the legitimate interests of the Data Controller (for example: the right of defense in legal proceedings; protection of credit positions) (Art. 6(1)(f) GDPR).

The provision of personal data is essential, and therefore mandatory, for the establishment and proper management of the contractual relationship between the Data Controller and the supplier.

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6. METHODS OF PROCESSING

The processing of personal data is carried out according to logic strictly related to the purposes identified above. It may be carried out both through IT and electronic tools, including automated ones, and through paper media, suitable for storing, managing and, where necessary, transmitting the aforementioned data.

In any case, the Data Controller has put in place adequate technical and organizational measures to ensure the security and confidentiality of the data and to prevent the risk of loss, destruction, unauthorized access, unlawful use and dissemination thereof.

Still within the scope of the purposes specified above, personal data may be transferred to companies of the Lincotek group established in countries outside the European Economic Area (EEA). Should the transfer be made to a country for which the European Commission has not adopted an adequacy decision, the transfer of personal data will take place in accordance with the applicable legal provisions. Specifically, the transfer will be based on the Standard Contractual Clauses (also known as *Standard Contractual Clauses* or SCCs) approved by the European Commission, pursuant to Art. 46(2)(c) GDPR, as an adequate safeguard for the purposes of the transfer. The data subject has the right to obtain a copy of such safeguards. To receive a copy of the signed Standard Contractual Clauses or to obtain further information on the transfer of your data, you may send a request to privacy.group@lincotek.com.

Personal data will not be disseminated.

The processing activities are not supported by automated decision-making processes, including profiling, that produce legal effects on the data subject or that similarly significantly affect them.

7. DURATION OF PROCESSING

Personal data will be processed for the entire duration of the contractual relationship with the Company for which the data subject works, unless retention for longer periods becomes necessary in order to comply with specific regulatory obligations.

8. PERSONS AUTHORISED TO PROCESS THE DATA AND DATA RECIPIENTS


Within the organizational structure of the Data Controller, personal data may be accessed and processed by persons authorized to carry out the processing, who are adequately trained and have undertaken a duty of confidentiality. Such persons will operate in a manner consistent with their respective roles and exclusively for the pursuit of the purposes indicated in this notice.

In the course of carrying out certain processing activities, the Data Controller may disclose personal data to third parties (competent authorities; consulting firms, including legal ones; companies providing IT services in support of the processes related to data processing for the purposes indicated above; customers), which act as independent data controllers or as data processors. In the latter case, the processing takes place under specific agreements signed pursuant to Art. 28 GDPR by the data processor with the Data Controller.

9. RIGHTS OF THE DATA SUBJECT

Under the conditions provided for by the applicable legislation, the data subject has the right to exercise the following rights by contacting privacy.group@lincotek.com:

- a) access to personal data (Art. 15 GDPR), which allows you to obtain confirmation as to whether or not personal data concerning you are being processed and, if so, to obtain access to such data;
- b) rectification of personal data (Art. 16 GDPR), which allows you to obtain the rectification and/or completion of personal data that are inaccurate or incomplete;
- c) erasure of personal data (Art. 17 GDPR), which allows you, where the legal conditions are met, to obtain the erasure of personal data;
- d) restriction of processing (Art. 18 GDPR), which allows you, in specific cases, to restrict the processing of personal data;

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- e) data portability (Art. 20 GDPR), which allows you, in certain cases and only with respect to the data provided by the data subject, to receive personal data in a structured, commonly used and machine-readable format;
- f) the right to object (Art. 21 GDPR), which allows the data subject to object at any time, on grounds relating to their particular situation, to the processing of personal data carried out by the Data Controllers in pursuit of their legitimate interest.

Should the data subject consider that the processing of personal data relating to them is carried out in breach of the GDPR, they have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) in accordance with the procedures laid down by that authority, or to bring the matter before the competent judicial authorities.